

1 Tuesday, 21 February 2017
 2 (10.30 am)
 3 THE CHAIRMAN: Thank you, Mr Beer.
 4 MR BEER: Nicola Moore, please, sir. Thank you.
 5 MS NICOLA MOORE (sworn)
 6 THE CHAIRMAN: Please feel free to sit down.
 7 **A. Thank you.**
 8 **Questions from MR BEER**
 9 MR BEER: Is it Ms Moore or Mrs Moore?
 10 **A. It is Mrs Moore.**
 11 Q. Mrs Moore, my name is Jason Beer and I ask questions
 12 with Ms Cartwright on behalf of the Inquiry. In front
 13 of you there, there should be a bundle with your name on
 14 it.
 15 **A. There is.**
 16 Q. If you could open it up, please and start in tab 1, just
 17 behind A, you should see a witness statement, dated
 18 25 June 2014 in your name.
 19 **A. Yes.**
 20 Q. Then if you go over to tab 2, please, you should find
 21 there a witness statement dated 30 October 2014, also in
 22 your name.
 23 **A. Yes.**
 24 Q. Are those statements true to the best of your knowledge
 25 and belief?

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1 **A. They are, yes.**
 2 Q. Thank you very much. Can you tell us a little bit about
 3 yourself from a legal perspective, are you solicitor or
 4 a barrister?
 5 **A. I am a solicitor.**
 6 Q. Okay. When were you admitted to the role?
 7 **A. I qualified in August 1999 and I have worked for the**
 8 **Crown Prosecution Service since June 2001.**
 9 Q. Since 2001?
 10 **A. Yes.**
 11 Q. Then did you begin working for the CPS again after 2001?
 12 **A. I have remained with them since -- no, sorry, yes, 2001.**
 13 **And I was a crown prosecutor for two years and then**
 14 **a senior crown prosecutor, so I have been there**
 15 **15 years. Yes.**
 16 Q. Okay.
 17 **A. I think.**
 18 Q. You started in 2001?
 19 **A. Yes.**
 20 Q. And it follows that in late 2011 --
 21 **A. Yes.**
 22 Q. -- and early 2012 you were a crown prosecutor?
 23 **A. I was a senior crown prosecutor, yes.**
 24 Q. That was your job title, senior crown prosecutor?
 25 **A. Yes.**

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1 Q. What does a senior crown prosecutor do, please?
 2 **A. We, basically, review cases that come to us from the**
 3 **police. We can be involved, as I was in this case, at**
 4 **a pre-charge stage. Also we can be the reviewing**
 5 **lawyers for cases that we are allocated post charge and**
 6 **we see those cases through on a day-to-day basis until**
 7 **they reach trial.**
 8 Q. In terms of the pre-charge stage, the investigatory
 9 stage, did your job sometimes involve advising the
 10 police during the course of an investigation?
 11 **A. It did, yes.**
 12 Q. Did it sometimes at that stage include advising the
 13 police on evidential sufficiency?
 14 **A. We would have discussions -- quite often on cases that**
 15 **were larger, like this, we would engage with the police**
 16 **from an early stage and our job would be to give**
 17 **a steer, informal advice, discuss with them the evidence**
 18 **at that stage and perhaps what they should be looking**
 19 **for in terms of getting evidence to satisfy a charge and**
 20 **ultimately a conviction.**
 21 Q. Okay. You mention there "informal advice", did the
 22 informality relate to the means of communication or the
 23 extent to which it could be relied on?
 24 **A. It is a police decision as to whether or not a case**
 25 **meets the threshold test. They would come to us,**

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1 **though, during a, in this case a surveillance operation**
 2 **and perhaps discuss on an informal basis where the case**
 3 **was at. So in relation to this case, I was allocated**
 4 **the case by a manager. The police would have contacted**
 5 **my manager and said, "There is an ongoing surveillance**
 6 **operation, it would be useful if we had an allocated**
 7 **lawyer".**
 8 **I was allocated that case and I then set up**
 9 **discussions with the police where they would initially**
 10 **have given me the background to the case, who the**
 11 **suspects were, what the evidence was to date, and how**
 12 **they were looking at progressing the case. That would**
 13 **have been done on an informal basis, in that it was not**
 14 **formal advice, as in a formal charging decision.**
 15 Q. It is advice that can be relied on by the police?
 16 **A. Yes.**
 17 Q. So it is formal to that extent?
 18 **A. It is a discussion. The police -- in this case the**
 19 **police came to me and they were aware that up until the**
 20 **point of the case being charged, or in the discussions**
 21 **that I had had with them prior to charge, there was,**
 22 **there were discussions as to whether or not there was**
 23 **sufficient to get a charging decision and they knew that**
 24 **there wasn't.**
 25 Q. Okay.

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1 I will break down some of the things that you said
 2 there, if I may. You said that the case was allocated
 3 to you. When it was it allocated to you?
 4 **A. We are talking about five years ago.**
 5 Q. Yes.
 6 **A. I would have said it was probably in the December.**
 7 **December or early January.**
 8 Q. Who allocated it to you?
 9 **A. It would have been a manager within the CPS, I couldn't**
 10 **tell you who.**
 11 Q. Do you create any records when a case is allocated to
 12 you in this way?
 13 **A. We do now. At the time our case management systems were**
 14 **not the same as they are now. So it would have been**
 15 **a discussion that was had on email rather than a case**
 16 **being actually put on what we call the case tree, the**
 17 **case management system.**
 18 Q. Right, so the answer is no, you haven't kept any record
 19 yourself of the advice that you gave or what you were
 20 told?
 21 **A. No. No.**
 22 Q. Okay. You mention that the police would come to you for
 23 informal advice of this nature in the course of
 24 an operation.
 25 **A. Yes.**

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1 Q. Is it right that the police remained responsible for
 2 operational decisions?
 3 **A. Absolutely.**
 4 Q. Okay.
 5 Can you give us an idea to what extent it was usual
 6 or unusual for, in investigations of this species, of
 7 this size, for the police to seek the views of the CPS
 8 as to evidential sufficiency?
 9 **A. It was standard.**
 10 Q. Can we turn, then, to Operation Shire, please.
 11 **A. Yes.**
 12 Q. You have said that you first were allocated in you think
 13 December time?
 14 **A. Yes.**
 15 Q. Can you recall the date on which you first became
 16 involved in Operation Shire by actually having
 17 a communication with a police officer about it?
 18 **A. No, I can't recall the date.**
 19 Q. What were the frequency of the discussions or meetings,
 20 so whether by telephone or in person or by email, or
 21 with the police investigation team up until 3 March?
 22 **A. I can't recall exactly how many conversations there**
 23 **were. I can't recall whether there were specifically**
 24 **any sit down meetings. All I can say is that it would**
 25 **normally be my practice, in a case of this nature, of**

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1 **this type, to sit down with the police and have**
 2 **an initial meeting in terms of the background, where**
 3 **they think it is going, what a strategy might be in**
 4 **order to get the best outcome. I can't recall**
 5 **specifically a meeting in this case, but that would be**
 6 **my normal practice. There were certainly telephone**
 7 **calls, again I can't unfortunately give you specific**
 8 **dates. There were telephone calls with both the officer**
 9 **in the case, DC Talbot, and the senior investigating**
 10 **officer --**
 11 Q. DI Cousen?
 12 **A. DI Cousen, yes.**
 13 Q. Can you remember roughly the number of either meetings
 14 or telephone calls before 3 March?
 15 **A. There would probably only have been, if there was**
 16 **a meeting, probably only the one and that would have**
 17 **been at a very initial stage in order just to get the**
 18 **background.**
 19 Q. Just stopping you there, if you look at tab 1 in the
 20 bundle there at your witness statement of 25 June.
 21 **A. Yes.**
 22 Q. In the third paragraph, you say:
 23 "During this operation I had numerous meetings and
 24 telephone discussions with the SIO, DI Cousen, and the
 25 case officer, DC Talbot."

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1 **A. Yes.**
 2 Q. You speak there of having "numerous meetings" with them.
 3 Is that because this is not restricted to before
 4 3 March?
 5 **A. Well no --**
 6 Q. That paragraph.
 7 **A. -- certainly we had a significant number of meetings**
 8 **over the course of the case.**
 9 Q. Yes.
 10 **A. Yes. In terms of pre-charge, we had -- I would have**
 11 **said that we had a number of telephone discussions.**
 12 Q. Yes.
 13 **A. I don't recall any specific meetings that I can remember**
 14 **now. I am not saying there weren't.**
 15 Q. Okay.
 16 **A. As I say, it is five years ago and I do not have any**
 17 **notes from then. We did take notes -- I would have**
 18 **taken notes in relation to meetings. Unfortunately we**
 19 **have moved offices four or five times since that date**
 20 **and we are now entirely paperless and a lot of these**
 21 **sort of notebooks have gone astray in that time. I have**
 22 **looked for my notebook from then and I don't have it.**
 23 Q. Presumably you looked for it as well when the IPCC came
 24 to you --
 25 **A. I did, yes.**

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1 Q. -- in June and October?
 2 **A. We had moved at least twice by that stage as well.**
 3 Q. Can I at a high level then look at the records that we
 4 have of contact and then I will come and examine each of
 5 the contacts that we have.
 6 **A. Yes.**
 7 Q. The first one -- I don't think this is in your witness
 8 bundle, actually -- it is in file K/1195, so the --
 9 **A. No, it is not in my bundle.**
 10 Q. I am sure the usher behind you will get it for you.
 11 K/1195.
 12 **A. Yes.**
 13 Q. Can you see at the foot of the page, it says, "Speak to
 14 CPS Nicky Moore"?
 15 **A. Yes.**
 16 Q. If you go back one page, to 1194, you will see that is
 17 26 January 2012.
 18 **A. Yes.**
 19 Q. Do you see that?
 20 **A. Yes.**
 21 Q. This a note in DI Cousen's books, so we have a note of
 22 a conversation with you and DI Cousen on
 23 26 January 2012.
 24 **A. Yes.**
 25 Q. I am going to call that contact 1.

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1 **A. Okay.**
 2 Q. If we just put that to one side, at the moment, and
 3 bundle W, please, at page 430.
 4 **A. Yes.**
 5 Q. Can you see in the middle of page 430, it is only two
 6 lines, we will explore what is above and below it in
 7 a moment?
 8 **A. Yes.**
 9 Q. Can you see an email from you to Mr Talbot --
 10 **A. I can, yes.**
 11 Q. -- on 21 February at 8.25 in the morning?
 12 **A. Yes.**
 13 Q. That is contact 2, 21 February. If we can put that to
 14 one side, please.
 15 Then the third contact is in your bundle, tab 10,
 16 can you see a note in a casebook, this is 1 March 2012?
 17 **A. Yes, I can. Yes.**
 18 Q. And that is DC Talbot's casebook?
 19 **A. Yes.**
 20 Q. "10.45, speak to Nicky Moore."
 21 **A. Yes, I can.**
 22 Q. I am going to call that third contact.
 23 They are I think the records of three contacts --
 24 **A. Yes.**
 25 Q. -- that officers in this case had with you.

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1 **A. Yes.**
 2 Q. They don't record a face-to-face meeting.
 3 **A. No.**
 4 Q. When you say that you think there would have been one,
 5 is that because it was the usual practice to have a face
 6 to face right at the start?
 7 **A. It was my usual practice, because it just makes it**
 8 **easier on a face-to-face basis to get a flavour of what**
 9 **is going on, who is who, and where the investigation is**
 10 **at. But I can't specifically remember whether there was**
 11 **one or not.**
 12 Q. Okay. In your witness statement, I will read it to you
 13 rather than turning it up, your first witness statement,
 14 you said:
 15 "I recall particularly one conversation when they
 16 called me and they said they knew there was insufficient
 17 evidence."
 18 **A. Yes.**
 19 Q. Which makes it sound like there was two people on the
 20 other end of the phone.
 21 **A. No. No, I only ever had conversations with one person**
 22 **at a time.**
 23 Q. So the "they" is not meant in the plural, it means one
 24 of DI Cousen or DC Talbot?
 25 **A. Yes.**

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1 Q. Okay.
 2 There weren't any joint telephone conferences?
 3 **A. No, there weren't. Certainly not that I can recall, no.**
 4 Q. I understand.
 5 Can we come then to the first contact, the 26th
 6 then, so that is K/1195.
 7 **A. Yes.**
 8 Q. If we can read the entry -- first of all, do you
 9 remember anything about this contact, so end
 10 of January 2012?
 11 **A. I don't remember specifically without looking at exactly**
 12 **what is said.**
 13 Q. All right. Let's read what he has written:
 14 "Spoke [or speak] to CPS Nicky Moore who has in turn
 15 spoke to Mark Callaghan about this case. She has
 16 reviewed the information that I have provided to her
 17 verbally and advised that the case is on the cusp of
 18 passing the threshold test. Much would depend on what
 19 items are in the car, weapons, face coverings, means of
 20 communications, et cetera."
 21 Over the page:
 22 "If the OCG are observed watching a van or indeed
 23 start to follow a van, then this greatly strengthens the
 24 case and will pass the investigation through the
 25 charging threshold. Advised I would update her as the

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1 case progresses."
 2 Then it turns to something else.
 3 **A. Yes.**
 4 Q. Do you remember advising DI Cousen that the case was on
 5 the cusp of passing the threshold test as early
 6 as January 2012?
 7 **A. I don't remember using those words exactly. I recall**
 8 **discussions and I do recall discussions with him where**
 9 **we would look at what had happened to date. I do recall**
 10 **that it was the police view that there wasn't sufficient**
 11 **to proceed and I agreed with that.**
 12 Q. Do you -- in that context why were they calling you, did
 13 they explain why they were speaking to you if they knew
 14 there was not sufficient to pass through the gateway?
 15 **A. I have mentioned, I think, in one of my statements this**
 16 **was an investigation that involved a number of**
 17 **surveillance operatives, it involved potentially**
 18 **firearms, although the deployment of firearms officers**
 19 **had absolutely nothing to do with me, but there were**
 20 **a number of resources that were being used by, or**
 21 **utilised by, the police in terms of the investigation.**
 22 And I do remember DI Cousen saying to me in
 23 a conversation -- I don't know if it was this one or
 24 not -- that he would need to go back to his supervision
 25 if there wasn't sufficient to get a charging decision in

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1 **order to proceed the investigation.**
 2 **It was something where my recollection of the**
 3 **conversation is that they didn't want to carry on using**
 4 **all the resources --**
 5 Q. Who is the "they"?
 6 **A. The police.**
 7 Q. Yes.
 8 **A. If they already had enough evidence to get a charging**
 9 **decision. There wasn't sufficient evidence to obtain**
 10 **a charging decision and so the investigation proceeded.**
 11 **It was -- I am guessing, I am not in the police,**
 12 **I was not present when those meetings took place -- so**
 13 **that DI Cousen could go back to his supervising officers**
 14 **and said that he had checked with the CPS and that they**
 15 **were in agreement that there wasn't sufficient to**
 16 **proceed at that stage.**
 17 **I hope that makes sense.**
 18 Q. Yes.
 19 I just want to check it against what you said in
 20 writing. If we can look at your first statement,
 21 please, which is tab 1.
 22 **A. Yes.**
 23 Q. It is in the third paragraph, you say:
 24 "Initially the conversation related to the evidence
 25 in general and I recall particularly one conversation

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1 when they called me and said they knew there was
 2 insufficient evidence to pass the threshold test, but
 3 they were under a lot of pressure from their superiors
 4 because the investigation was resource heavy."
 5 **A. Yes.**
 6 Q. Is that the conversation we are referring to now?
 7 **A. Yes.**
 8 Q. We can narrow it down that the "they" on this occasion
 9 was DI Cousen?
 10 **A. Yes.**
 11 Q. In your statement here you say that he "was under a lot
 12 of pressure from his superiors because the investigation
 13 was resource heavy".
 14 Did he explain what the pressure was?
 15 **A. No. To be honest, I couldn't tell you in exactly what**
 16 **context the conversation was, specifically I recall him**
 17 **saying that there were a number of resources that were**
 18 **being utilised in the investigation and that he would**
 19 **need to go back to his supervising officers. What**
 20 **surrounded that -- those are the only two things that**
 21 **I can specifically remember from that conversation.**
 22 **Exactly what surrounded that, I am afraid, I can't**
 23 **recall the exact context.**
 24 **So I certainly don't know what the pressure was.**
 25 Q. No. The way you explained it a moment ago was that they

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1 knew that there was insufficient evidence to charge.
 2 **A. Yes.**
 3 Q. And they knew that you would say the same?
 4 **A. I can't say what they knew, because I am not them,**
 5 **obviously. It was -- to me, it was that they were**
 6 **checking.**
 7 Q. Right. Thank you.
 8 You see in DI Cousen's note it has you going off to
 9 speak to Mark Callaghan?
 10 **A. Yes.**
 11 Q. Can you remember doing that on an occasion, and if it
 12 was not necessarily 26 January then maybe another
 13 occasion?
 14 **A. There was more than one occasion when I would have**
 15 **discussed it with Mark Callaghan, who was my direct**
 16 **manager at the time. But, again, it was a very fluid**
 17 **investigation. The police would call and give an update**
 18 **as to where they were, as they did on this occasion.**
 19 **And I do recall speaking to Mark Callaghan, I think**
 20 **after the suspects had been up and down to**
 21 **Stoke-on-Trent, I think it was on two occasions, I don't**
 22 **know if that is at this stage.**
 23 Q. That would have been by now.
 24 **A. That would have been by now.**
 25 **And they then stopped going down to Stoke-on-Trent.**

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1 **So, yes, we did have discussions where I said that I had**
 2 **been contacting the police and where we had agreed that**
 3 **there was not sufficient evidence to get a charging**
 4 **decision.**
 5 Q. What was the purpose of going off to your line manager?
 6 **A. That is something I do on a fairly regular basis, I am**
 7 **not somebody that goes off on my own. I tend to check**
 8 **myself by going and speaking to somebody. Particularly**
 9 **in a case like this, I wanted to make sure that the**
 10 **conversations we were having and the things that I was**
 11 **saying were correct.**
 12 Q. When you say particularly in a case like this, what is
 13 a case like this?
 14 **A. It was a big case.**
 15 MR BEER: Okay.
 16 You see that Mr Cousen has you advising in this note
 17 that much would depend on what items are in the car,
 18 "Weapons, face coverings, means of communication ..."
 19 Does that ring a bell as advice that you gave?
 20 **A. Again, I don't know whether I would have called it**
 21 **"advice", as in "formal advice". It would have been**
 22 **a discussion about what potentially they could be**
 23 **looking for that could make, give a positive outcome as**
 24 **far as a charging decision was concerned and, yes, those**
 25 **could certainly have been things that we would have**

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1 **discussed as assisting.**
 2 Q. He has you advising that if the OCG are observed
 3 watching a van, or even better following a van, that
 4 would greatly improve or strengthen the case. Can you
 5 remember --
 6 **A. I can't remember saying that. I am not saying that it**
 7 **was not said. I can't recall.**
 8 Q. Thank you.
 9 Can we turn to the second contact then,
 10 20 February 2012. This is bundle W, at page 430,
 11 initially.
 12 Sorry, it had been put away, had it?
 13 **A. Sorry, 430, yes.**
 14 Q. You remember this was your email, middle of the page?
 15 **A. That is my email, yes.**
 16 Q. You can see the first email, at the bottom, was from
 17 DC Talbot to you, and if we just go back, we can see the
 18 whole email, 423, this is on 20 February.
 19 **A. Yes.**
 20 Q. "Nicky, I have attached a current MG3 in relation to
 21 Operation Shire and in particular the Totton side of the
 22 operation. I am currently reluctant to create an open
 23 ICIS case tree. Is that the thing you referred to
 24 earlier?
 25 **A. The police have an ICIS system. We have a separate case**

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1 **management system and they --**
 2 Q. Speak to each other?
 3 **A. Sometimes. Yes, they do. They should.**
 4 Q. Was he saying here, "I don't really want to create
 5 an MG3 on the case system"?
 6 **A. I think he is suggesting there that because it was**
 7 **a proactive surveillance operation that was pre-charge,**
 8 **he didn't want to -- I don't know. I anticipate it was**
 9 **that he didn't want it opening up on the ICIS case tree**
 10 **and wanted it doing over the email.**
 11 Q. Yes, "... due to the nominals involved and the covert
 12 nature of the investigation. However Justin will create
 13 a pre-arrest case tree and I will email you the
 14 reference number later tonight or tomorrow when it is
 15 created ..."
 16 **A. Yes.**
 17 Q. "... I am only sending this now in case we need to
 18 approach a firearms team for further assistance as the
 19 superintendent will always ask if there is enough
 20 evidence to arrest and charge at present."
 21 Had you been asked to advise in this way before,
 22 namely as a precursor to a request for a firearms
 23 deployment?
 24 **A. The fact that there was going to be a firearms**
 25 **deployment, or potentially a firearms deployment, would**

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1 **have nothing to do with me at all.**
 2 Q. That is a different issue. Had you been asked to advise
 3 in the context of and as a precursor to an application
 4 for a firearms deployment?
 5 **A. I don't recall specifically being asked for any advice,**
 6 **specifically because there was due to be a firearms**
 7 **deployment.**
 8 Q. We can see that you were in this case, here, but I am
 9 talking about in other cases, was it a usual thing to
 10 happen?
 11 **A. No. I don't know whether -- that would not have been**
 12 **something that I would have necessarily looked at in**
 13 **terms of the email. What they are doing there, the**
 14 **police, is sending me an MG3, that is not a trigger,**
 15 **an automatic trigger to me giving formal advice, that is**
 16 **purely them sending me an outline of the case. It just**
 17 **happens to be on an MG3. That document would be being**
 18 **updated as the investigation progressed and that was the**
 19 **means by which they were sending me the information that**
 20 **wasn't necessarily -- and it certainly wasn't in this**
 21 **case -- a request for formal advise or a charging**
 22 **decision.**
 23 Q. What were they asking you for?
 24 **A. I think what they are doing there is sending me**
 25 **an up-to-date chronology in effect.**

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<p>1 Q. There was no request to do anything with it?</p> <p>2 Just take a moment to read the whole email. (Pause)</p> <p>3 A. I can't -- they, he obviously says in the last</p> <p>4 paragraph, "I am sending this now in case we need to</p> <p>5 approach a firearms team".</p> <p>6 I would have read that in that if they got to</p> <p>7 a stage where they felt that there was sufficient to</p> <p>8 arrest the suspects, which is why they would be</p> <p>9 utilising the firearms team in an arrest scenario, if</p> <p>10 they had made that decision themselves, that there was</p> <p>11 sufficient to arrest, then they would be coming to me</p> <p>12 after arrest for a charging decision.</p> <p>13 So it was -- I would read that that they were</p> <p>14 sending me the information, on the basis that I was</p> <p>15 going to be ready when or if the decision was made that</p> <p>16 there was enough to arrest and they had arrested the</p> <p>17 suspects.</p> <p>18 Q. So you didn't need to do anything immediately, like</p> <p>19 advise on whether it had passed the threshold test or</p> <p>20 not --</p> <p>21 A. No, no.</p> <p>22 Q. -- unless and until they were arrested and then it came</p> <p>23 to you for a charging decision?</p> <p>24 A. Again, I could have been spoken to to give a steer or</p> <p>25 a -- but there was no formal advice given, no.</p> <p style="text-align: center;">Page 21</p>	<p>1 give a view on whether it passes the threshold test, do</p> <p>2 they?</p> <p>3 A. No.</p> <p>4 Q. You gave advice that it doesn't pass the threshold test?</p> <p>5 A. Yes.</p> <p>6 Q. Can we look then at the MG3 that was attached. That</p> <p>7 starts at page 424. This is the first page of an MG3,</p> <p>8 isn't it, page 424 --</p> <p>9 A. It is, yes.</p> <p>10 Q. -- that was attached to DC Talbot's email?</p> <p>11 A. Yes.</p> <p>12 Q. Then if we go over to 425. Just go through it quite</p> <p>13 quickly if we can:</p> <p>14 "This report is in respect of Operation Shire which</p> <p>15 is a proactive investigation into an OCG who have been</p> <p>16 involved in the planning and commission of robberies</p> <p>17 around the north-west area of England. The operation</p> <p>18 has utilised surveillance which commenced on</p> <p>19 18 October 2011 on various members of the OCG. The OCG</p> <p>20 have displayed a level of organisation by having stolen</p> <p>21 vehicles which have had their original registration</p> <p>22 plates masked by registration plates which tally to</p> <p>23 a vehicle of the same model, age and colour. The</p> <p>24 suspects who have been arrested in relation to this</p> <p>25 incident are [blank], [blank], [blank] and [blank].</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. If we just look at page 430 before we look at the MG3,</p> <p>2 at page 430 we can see what your reply was.</p> <p>3 A. Yes. I have said it doesn't pass the threshold test.</p> <p>4 Q. So you did advise?</p> <p>5 A. I have agreed with them that it doesn't pass the</p> <p>6 threshold test --</p> <p>7 Q. Hold on. They hadn't said that they thought that it</p> <p>8 didn't pass the threshold test, had they?</p> <p>9 A. But we -- my recollection is that previously we had</p> <p>10 discussed that the case hadn't passed the threshold</p> <p>11 test.</p> <p>12 Q. When was that?</p> <p>13 A. Well --</p> <p>14 Q. We have seen something a month earlier on 26 January,</p> <p>15 and then we have got, now, and we are going to look in</p> <p>16 a moment what had happened in between, a month or so</p> <p>17 later, about a month later.</p> <p>18 A. I may well have reconsidered the evidence at that stage.</p> <p>19 My view was at that stage the case did not pass the</p> <p>20 threshold test. Whether that was the police saying to</p> <p>21 me, "It doesn't pass the threshold test, do you agree?"</p> <p>22 Or whether that was me saying, "It doesn't pass the</p> <p>23 threshold test" and the police agreeing, I am not able</p> <p>24 to say.</p> <p>25 Q. We can see certainly on the face of the email they don't</p> <p style="text-align: center;">Page 22</p>	<p>1 Sequence of events ..."</p> <p>2 Then he sets out a sequence of events in the next</p> <p>3 paragraph, saying that on 13 December a red Audi A6 was</p> <p>4 stolen in Bolton.</p> <p>5 A. Yes.</p> <p>6 Q. Yes.</p> <p>7 Then in the next paragraph after that, DC Talbot</p> <p>8 says, "The next day a blue BMW was stolen". Yes?</p> <p>9 A. Yes.</p> <p>10 Q. The next paragraph after that he says that they were,</p> <p>11 effectively, their location was not known until a month</p> <p>12 and a bit later, 23 January, when the Audi and the BMW</p> <p>13 both turned up, one in Worsley, one in Boothtown,</p> <p>14 displaying different plates?</p> <p>15 A. Yes. Yes.</p> <p>16 Q. The next day the vehicles were switched.</p> <p>17 A. Yes.</p> <p>18 Q. If their locations were switched, and the next day they</p> <p>19 were seen down in Stoke?</p> <p>20 A. Yes.</p> <p>21 Q. On 24th they had been down into Stoke?</p> <p>22 A. Yes.</p> <p>23 Q. That was an early morning visit to Stoke, I think.</p> <p>24 A. I think was it the 25th they went to Stoke.</p> <p>25 Q. Yes, I am so sorry, you are quite right, the 25th,</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

1 an early morning visit to Stoke, I think both vehicles,
 2 with the BMW being spotted at 7.45 turning on to the
 3 Warrington Road and then officers in Staffordshire
 4 seeing the Audi in a road near a cash depot, yes?
 5 **A. Yes.**
 6 Q. The Audi turning back on itself on the same road and
 7 then doing the same thing again?
 8 **A. Yes.**
 9 Q. A single man wearing a hi-viz bib top.
 10 The BMW, with a rear seat passenger, seen in the
 11 same road, Victoria Road. Then driving along the same
 12 route when a blue G4S van is held in the mouth of the
 13 junction?
 14 **A. Yes.**
 15 Q. Then, over the page, the red Audi seen at 8.46, the
 16 driver still wearing a hi-viz jacket and coming back
 17 north. The BMW seen in Boothtown, the Audi is seen in
 18 Sandringham Road in Boothtown, there are some
 19 descriptions and I think nothing else of particular note
 20 in those paragraphs.
 21 Later in the day, a recovery vehicle drives up
 22 behind the stolen Audi, two males get out and then later
 23 the same two males get out of a BMW, one of them takes
 24 an item from the recovery truck which appears to be
 25 petrol cans and puts it in the rear of the BMW, yes?

Page 25

1 **A. Yes.**
 2 Q. Then the second visit I think to Stoke on 26 January,
 3 very early morning start, a recovery truck at 4.44 in
 4 the morning heading towards Sandringham Road pulls up
 5 behind a parked car. A single person gets out of the
 6 recovery truck and gets into the car. It is a five-door
 7 BMW he drives away. The BMW I think is sighted heading
 8 towards the M60 at junction 13, followed by the stolen
 9 Audi and they go south. Yes?
 10 **A. Yes.**
 11 Q. They are then seen early in the morning in Congleton,
 12 then there is a description of the driver of the BMW.
 13 A description of the driver of the stolen Audi wearing
 14 a fluorescent top, and they head towards Stoke.
 15 Over the page, some more observations in the same
 16 location as the previous day, in Victoria Road.
 17 **A. Yes.**
 18 Q. The driver of the Audi is wearing a hi-viz jacket still,
 19 by now the BMW is seen with four people on board.
 20 A little later at 7.21, we are now back up I think in
 21 Worsley, a black Renault Megane is seen with a driver
 22 and a rear seat passenger wearing bob hats.
 23 Robert Rimmer is the owner of that, the legitimate owner
 24 of the Renault Megane.
 25 Then there are further observations, up until 7.56,

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1 when the BMW is seen to have a yellow-handled
 2 sledgehammer laying on the rear of the vehicle.
 3 **A. Yes.**
 4 Q. The BMW is moved the following weekend. The vehicles
 5 are swapped again. On 9 February a member of the public
 6 reports the stolen BMW as being suspicious and it is
 7 seized and forensically examined, and then it stops?
 8 **A. Yes.**
 9 Q. I think that is the evidence or the summary of the
 10 evidence that you had which was that there were two
 11 stolen cars, I think, on cloned plates, they were being
 12 kept in a safe residential area, were switched on
 13 a number of occasions, the safe area did not have
 14 a connection with the suspects, I think that was the
 15 point that was being made?
 16 **A. Yes, that's correct.**
 17 Q. There were two visits to Stoke --
 18 **A. Stoke, yes.**
 19 Q. -- both early morning, both with two cars travelling, on
 20 one, both occasions, in proximity to a cash depot. On
 21 one occasion a number of drive pasts, and on both
 22 occasions a subject wearing a hi-viz jacket, some petrol
 23 cans and a sledgehammer were seen?
 24 **A. Yes.**
 25 Q. Can we see your advice then, at page 430.

Page 27

1 **A. Sorry.**
 2 Q. You said that the case did not pass the threshold test.
 3 **A. My email is sent on 21 February, which is nearly a month**
 4 **after those two trips to Stoke-on-Trent.**
 5 Q. Yes.
 6 **A. They stopped going to Stoke-on-Trent. They only made**
 7 **the two trips, they were very -- our case was that they**
 8 **were very surveillance aware, whether they knew that**
 9 **there was surveillance, I don't know. But the trips**
 10 **stopped to Stoke and after that it went quiet, as far as**
 11 **I was concerned, so my view was that on 20 February,**
 12 **there wasn't sufficient evidence to have a charging**
 13 **decision, because we didn't know -- I think by that**
 14 **stage, yes, they had only done the two trips to Stoke.**
 15 **Clearly there was the suspicious behaviour in relation**
 16 **to the cars, but it didn't go any further than that at**
 17 **that stage, and my view was that it didn't pass the**
 18 **threshold test. There wasn't sufficient to charge.**
 19 Q. Not sufficient to charge for anything? Which charge
 20 were you considering?
 21 **A. Well, we didn't know exactly what we were looking at**
 22 **because it was a fluid investigation. Certainly we**
 23 **anticipated that it may be some kind of robbery and**
 24 **clearly the G4S depot in Stoke-on-Trent, we thought, may**
 25 **well have been a target. But they stopped going there**

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<p>1 immediately after the two occasions and never went back.</p> <p>2 Q. What you had is people travelling in stolen cars, plus</p> <p>3 some suspicious behaviour in proximity to a cash depot?</p> <p>4 A. Yes.</p> <p>5 Q. You didn't think that was sufficient to charge for</p> <p>6 a conspiracy to rob?</p> <p>7 A. At that stage, no, I didn't.</p> <p>8 Q. I think we can see in this series of communications that</p> <p>9 there is no suggestion by DC Talbot -- you could look at</p> <p>10 his reply as well at the top of page 430.</p> <p>11 A. Yes, okay, 430, sorry, yes, I've got it.</p> <p>12 Q. "Thanks for your reply. If you feel the circumstances</p> <p>13 at present do not pass the threshold test then that is</p> <p>14 fine. However, Justin has created a pre-arrest file,</p> <p>15 although at present I will leave it blank due to the</p> <p>16 nature of the investigation and will update yourself</p> <p>17 with any fresh evidence as and when we have it. If you</p> <p>18 need the file populating then that is fine, although</p> <p>19 I feel at present other than TWOC handling offences we</p> <p>20 will struggle with a full conspiracy and I am reluctant</p> <p>21 to update the file until a primary offence has been</p> <p>22 committed. If you need anything else or the file</p> <p>23 updating then please let me know."</p> <p>24 A. Yes.</p> <p>25 Q. We can see in this exchange -- his email to you, your</p> <p style="text-align: center;">Page 29</p>	<p>1 a bigger picture and it was their decision to proceed</p> <p>2 with the investigation for the conspiracy.</p> <p>3 Q. Did you advise on that at all, about "We could make out</p> <p>4 a TWOC or a handling"?</p> <p>5 A. I don't recall advising specifically in relation to</p> <p>6 a TWOC or a handling, no.</p> <p>7 Q. Thank you.</p> <p>8 Can I turn to the third occasion then. We can put</p> <p>9 this file away, thank you, and go to tab 10 in your</p> <p>10 file, please.</p> <p>11 A. Okay.</p> <p>12 Q. You will remember this was the note in DC Talbot's</p> <p>13 casebook?</p> <p>14 A. Yes.</p> <p>15 Q. Can you recall this conversation? It is a couple of</p> <p>16 days before the arrests took place and Mr Grainger died.</p> <p>17 A. I can't specifically recall the conversation, but</p> <p>18 I would have spoken to him, yes.</p> <p>19 Q. He has recorded:</p> <p>20 "Speak to Nicky Moore, CPS lawyer, and discuss the</p> <p>21 recent events regarding the Audi travelling to the</p> <p>22 St Helens area on 21 February 2012 and the events of</p> <p>23 last night where the Audi travels to Culcheth with</p> <p>24 Totton and Grainger and the return where Totton places</p> <p>25 the hacksaw into the boot of his Audi."</p> <p style="text-align: center;">Page 31</p>
<p>1 email back and his email back -- that there is not any</p> <p>2 suggestion there of senior officers putting the SIO</p> <p>3 under any pressure, is there?</p> <p>4 A. No.</p> <p>5 Q. Do you think that means that that conversation had</p> <p>6 already occurred by now, back in January, or it was yet</p> <p>7 to occur, when we come to look at the March telephone</p> <p>8 conversation, that that is when it had occurred?</p> <p>9 A. The conversation in relation to the resources?</p> <p>10 Q. Yes.</p> <p>11 A. I can't possibly say when that conversation took place.</p> <p>12 I remember I was not in work when it took place, it was</p> <p>13 on my mobile. I can't give you a specific date as to</p> <p>14 when it occurred, unless you could tell me?</p> <p>15 Q. No, we can't.</p> <p>16 You see that DC Talbot's reply says that "other than</p> <p>17 TWOC or handling offences we would struggle with a full</p> <p>18 conspiracy". Did you consider whether TWOC, taking the</p> <p>19 vehicles without consent, or handling offences were made</p> <p>20 out?</p> <p>21 A. Clearly they were driving stolen vehicles. So they</p> <p>22 could have looked at arresting them potentially in</p> <p>23 relation to those matters, but then that would have</p> <p>24 meant the end of the investigation in relation to the</p> <p>25 bigger picture and my understanding was there was</p> <p style="text-align: center;">Page 30</p>	<p>1 Do you remember that?</p> <p>2 A. I do remember the evidence in relation to the hacksaw</p> <p>3 and I don't again specifically recall the conversation,</p> <p>4 but if it -- I don't suggest he is wrong at all, that it</p> <p>5 took place on 1 March, which would have been after the</p> <p>6 first trip to Culcheth.</p> <p>7 Q. "Due to the fact that the areas visited, Stoke,</p> <p>8 St Helens and Culcheth have been visited at times when</p> <p>9 premises are closed and nothing more than any</p> <p>10 'preparatory activity' has taken place then there will</p> <p>11 be insufficient evidence to charge with any substantial</p> <p>12 offences. Subjects need to have weapons, relevant</p> <p>13 clothing (gloves, balaclavas)."</p> <p>14 You see from the words "due to", does that look to</p> <p>15 you like a record of your advice?</p> <p>16 A. It does look like that. I don't -- I certainly don't</p> <p>17 recall saying that there was not sufficient because</p> <p>18 premises were closed. Quite often premises are closed.</p> <p>19 Again, it would have been a conversation in the</p> <p>20 round about the general evidence, they had clearly been</p> <p>21 to Stoke, there had then been a gap. They had been to</p> <p>22 St Helens but they had only been to St Helens once. And</p> <p>23 at the time of this conversation they had only been to</p> <p>24 Culcheth on the one occasion. So again --</p> <p>25 Q. Just going back there, you said that quite often</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

1 premises are closed, what do you mean by that?

2 **A. You don't have to have a robbery in a -- premises don't**

3 **have to be open in order to have a robbery.**

4 Q. Do you remember discussing this, you see DC Talbot has

5 a note, as I think was certainly right in St Helens and

6 Culcheth, that the premises were -- a number of premises

7 were closed when the subjects visited. Do you have

8 a recollection of discussing that?

9 **A. No, I don't. I certainly recall conversations where we**

10 **would have said about it being merely preparatory.**

11 **I don't specifically recall anything about premises**

12 **being open or closed. I am not saying it didn't happen,**

13 **but I certainly don't -- I don't recall that.**

14 Q. Okay.

15 It is recorded that, given those two things, the

16 closed premises and no activity that is more than merely

17 preparatory, there is insufficient evidence to charge

18 with any, presumably that is substantive offences, or

19 substantial maybe. Can you recall a discussion, again

20 on this occasion, about charging or a threshold being

21 passed for an offence short of robbery or conspiracy to

22 rob?

23 **A. I don't recall any conversation about anything short of**

24 **a conspiracy. I do recall conversation where it was**

25 **said that there wasn't sufficient to proceed to**

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1 **a charging decision at that stage. In my view there**

2 **wasn't.**

3 Q. Why was that?

4 **A. Because at that stage they had been to Stoke on two**

5 **occasions, they had been to St Helens on the one**

6 **occasion and they had been to Culcheth on this one**

7 **occasion, but we didn't have -- in my recollection, we**

8 **didn't have any idea about what they were doing in**

9 **Culcheth. My view at the time was that there wasn't**

10 **sufficient to proceed. We are talking five years ago**

11 **unfortunately. I am sorry if I can't go into any more**

12 **detail.**

13 Q. Okay.

14 Then it is recorded that I think you advised that

15 subjects need to have weapons, relevant clothing,

16 gloves, balaclavas, can you recall giving such advice?

17 **A. No. I certainly -- I don't recall saying that subjects**

18 **need to have weapons. I certainly may well have said**

19 **that these are things that we could look at, weapons and**

20 **relevant clothing may be things that would assist but**

21 **I don't recall saying that they must have weapons or**

22 **relevant clothing.**

23 Q. Can you recall whether it was on this occasion that

24 there was a discussion about pressure from senior

25 officers, or wouldn't this be the case because this

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1 discussion was with DC Talbot and you are pretty clear

2 that the discussion about the pressure came from

3 DI Cousen.

4 **A. The conversation that I had in relation to having to go**

5 **back to his supervising officers in terms of not getting**

6 **a charging decision was with DI Cousen.**

7 Q. Can you recall, on either the discussion with DI Cousen

8 or with DC Talbot, anything about tipping points being

9 discussed?

10 **A. In relation to tipping points for arrest, that is**

11 **something that we don't have any dealings with at all.**

12 **I do recall tipping points being mentioned, whether**

13 **that was in relation to arrest or in relation to tipping**

14 **the point over which we could get to a charging**

15 **decision, the only thing that I can recall about tipping**

16 **points is that the confiscation -- well the only thing**

17 **that I can recall specifically about tipping points is**

18 **that I spoke to my divisional manager, Kevin Rogers,**

19 **following a conversation with the police, and that**

20 **I can't say who that conversation was with, whether it**

21 **was with DI Cousen or another investigating officer.**

22 **And I spoke to Mr Rogers about the fact that tipping**

23 **points had been mentioned.**

24 **At that time I recall I thought the conversation was**

25 **about tipping points for arrest, and it was agreed that**

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1 **we didn't have any part to play in that. That is**

2 **a completely police operational decision. I did speak**

3 **to Mr Rogers because it had been -- as far as I was**

4 **aware at the time there was some ongoing discussion**

5 **higher up in the police involving conspiracies and**

6 **tipping points and whether or not it was something that**

7 **involved the Crown Prosecution Service, and I remember**

8 **Mr Rogers saying that he would discuss it higher up the**

9 **hierarchy in the police, but it had nothing to do with**

10 **us and I didn't get involved in any discussion on**

11 **tipping points for arrest with the police. They didn't**

12 **ask me to.**

13 Q. You went to Kevin Rogers at some stage?

14 **A. Yes, I did.**

15 Q. When was that, that was before 3 March?

16 **A. It was.**

17 Q. What initiated you going off to Mr Rogers?

18 **A. A conversation with one of the investigating officers.**

19 Q. In this case?

20 **A. Yes.**

21 Q. Can you remember who it was?

22 **A. No, I can't.**

23 Q. Can you remember when it was?

24 **A. No, I can't.**

25 Q. Okay. They were asking you about the tipping points in

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1 the context of an arrest; is that right?
 2 **A. I am not sure whether they were talking to me in terms**
 3 **of tipping points for arrest or tipping points in**
 4 **relation to a charging decision. At the time I thought**
 5 **they were talking about tipping points for arrest,**
 6 **because that is why I spoke to Kevin Rogers about it.**
 7 Q. If it was tipping point for a charge, it wouldn't cause
 8 you any concern because it would be a natural
 9 conversation that you would happily participate in?
 10 **A. No.**
 11 **My understanding is that there was never any**
 12 **disagreement between us and the police in terms of us**
 13 **being involved in a tipping point decision. I mentioned**
 14 **it to Kevin Rogers as it was a little out of the**
 15 **ordinary.**
 16 Q. What was out of the ordinary?
 17 **A. Tipping points are an entirely police decision and**
 18 **I think because it was, because it had been mentioned,**
 19 **it was just something that I brought up with him.**
 20 Q. Okay, what were you being asked about then, in relation
 21 to tipping points --
 22 **A. I wasn't being asked --**
 23 Q. -- re an arrest?
 24 **A. I wasn't being asked, well --**
 25 Q. If you were not being asked about it, why did you go and

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1 see Mr Rogers?
 2 **A. Because it had been discussed --**
 3 Q. What was the "it"?
 4 **A. Tipping points in -- I recall the words "tipping**
 5 **points", but unfortunately I am not able to recall**
 6 **exactly in what context that was. But I do recall going**
 7 **to speak to Mr Rogers. Unfortunately I can't recall**
 8 **exactly what that was about.**
 9 **I was not asked to provide advice in relation to**
 10 **tipping points, certainly not from DI Cousen. Whether**
 11 **the conversation was with the officer in the case, and**
 12 **it got more towards tipping points and I was saying that**
 13 **this was something I didn't have any involvement in.**
 14 **I don't recall, I am speculating. I don't remember who**
 15 **that conversation was with.**
 16 Q. Can we look, please, at tab 4 of the bundle.
 17 **A. Yes.**
 18 Q. In particular -- it is unhelpful every other page is
 19 blank here -- if you look at page 1760 in the top right.
 20 **A. Yes.**
 21 Q. Can you see an email from Ian Rushton --
 22 **A. I can.**
 23 Q. -- to Stephen Liston, who is an IPCC investigator,
 24 copied to Mark Callaghan and then some other people
 25 within the CPS?

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1 **A. Yes, I can.**
 2 Q. He says "Stephen", and he is replying to an email. If
 3 you go on to 1762 --
 4 **A. Yes.**
 5 Q. -- on the second paragraph, he is responding to
 6 a suggestion that the IPCC had made to him:
 7 "I have noted the suggestion that the CPS provided
 8 guidance in respect of the move by GMP to the arrest
 9 phase of the inquiry. As you are aware, Nicky Moore,
 10 the reviewing lawyer who is currently on maternity leave
 11 but her line manager, Mark Callaghan to whom your
 12 earlier email was addressed, has managed to speak with
 13 her last week and Kevin Rogers, and I would inform you
 14 that neither of them can recall any agreement with the
 15 DI, DI Cousen, about tipping points as suggested.
 16 Indeed they recall, as did Mark Callaghan, that the CPS
 17 stressed to GMP that it would always be an operational
 18 decision when to arrest and would not be one for the CPS
 19 to become involved in."
 20 **A. Absolutely.**
 21 Q. Your recollection, as recorded here, is that you
 22 stressed to GMP that the issue of arrest and tipping
 23 points for arrest would always be an operational police
 24 decision?
 25 **A. They would.**

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1 Q. Why were you stressing that to GMP?
 2 **A. I don't remember stressing it to GMP. You know, this is**
 3 **an email from somebody who has spoken to somebody else,**
 4 **who has spoken to somebody else, who spoke to me when**
 5 **I was on maternity leave.**
 6 Q. Yes.
 7 **A. I don't recall specifically stressing that it was**
 8 **an operational -- I would certainly have said it was**
 9 **an operational police decision to whoever I was speaking**
 10 **to.**
 11 Q. But you --
 12 **A. It is an operational police decision.**
 13 Q. That may be so, but you don't, when you speak to
 14 a police officer about any case, say, "By the way,
 15 tipping points for arrest are an operational police
 16 decision". It has to come up, do you see what I mean,
 17 there has to be some reason for mentioning it?
 18 **A. Absolutely. Yes. I can't recall how it came into**
 19 **a conversation and, as I say, this is -- I don't even**
 20 **know -- it is Ian Rushton who is responding to this**
 21 **email, clearly these are his words.**
 22 **I have said as much as I can recall in terms of the**
 23 **conversation. It is very vague. I recall tipping**
 24 **points being raised and it being said that it was**
 25 **a police decision and not a decision that we became**

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<p>1 involved in. Because it was something that I perhaps 2 hadn't had dealings with previously, on any previous 3 cases, that may well have been why I spoke to Mr Rogers 4 about it, checking that this was the right thing. 5 Q. Then in the next paragraph of the email, I think this 6 might be something that you were referring to a moment 7 ago: 8 "It may be of interest to you to know that senior 9 colleagues here at CPS met with GMP senior command to 10 discuss concerns that GMP had at that time about the law 11 relating to conspiracy. In a nutshell GMP felt that the 12 law in effect prevented them from making an arrest as 13 early as they would like as any subsequent criminal 14 proceedings might be prejudiced due to the paucity of 15 evidence generated by an enquiry at that stage. The CPS 16 response was that the law was not complicated nor in our 17 view inadequate, but that evidence was obviously 18 required for successful criminal prosecution. 19 "In an effort to be constructive, the CPS 20 representatives suggested the adoption in cash in 21 transit robberies of a typology approach which has been 22 utilised for different types of fraud, ie boiler room 23 fraud, long firm fraud et cetera. Typologies of this 24 sort were sent to GMP to consider as a template for them 25 to construct cash in transit robbery typologies. We are</p> <p style="text-align: center;">Page 41</p>	<p>1 questions for you at all. 2 Does it follow, and it is probably something that 3 everyone in the room knows but just for clarification 4 that once a charging decision has been made, as 5 a prosecutor and working with the police you are under 6 an obligation to keep the evidence under review to make 7 sure that the tests that you have to apply continue to 8 be met right up until trial? 9 A. Absolutely, absolutely. 10 Q. Was that done in this particular case in terms of 11 Operation Shire? 12 A. It was, yes. The charging decision was made on the 13 threshold test, in other words pre-charge, I -- one of 14 the conversations I would have had with the police was 15 that if this was going to be a charging decision, it 16 would be a threshold test decision. We didn't need to 17 be trial ready at charge. 18 Q. No. 19 A. There would have been an application to the court in 20 order to apply for the suspects to be remanded in 21 custody. It was appropriate for the threshold test to 22 be used in terms of a charging decision. That was the 23 test that was used. Following on from that, the 24 defendants were remanded in custody and the case was 25 kept under review. A full code test would then have</p> <p style="text-align: center;">Page 43</p>
<p>1 also in the process of putting together a development 2 date with north-west police forces on the topic. It is 3 anticipated that CPS north-west lawyers will participate 4 in this event if it comes to fruition." 5 That is May 2013? 6 A. Yes. 7 Q. Is the first thing there the thing that you were talking 8 about, a more high level discussion between the CPS? 9 A. Yes. 10 Q. What do you know about that? 11 A. I don't. All I know is the conversation that I had with 12 Mr Rogers or the fact that it had been brought up in 13 a conversation with the police and for whatever reason 14 I mentioned it to Mr Rogers, he then took it up higher, 15 at a higher level, and I have no knowledge of what 16 happened after that. 17 MR BEER: Thank you very much indeed. They are all the 18 questions that I ask. 19 MR THOMAS: No questions, sir. 20 MR DAVIES: No thank you, sir. 21 THE CHAIRMAN: Ms Whyte? 22 MS WHYTE: Thank you, just a few. 23 Questions from MS WHYTE 24 MS WHYTE: Mrs Moore, I ask questions on behalf of the 25 Greater Manchester Police, and I don't have many</p> <p style="text-align: center;">Page 42</p>	<p>1 been applied when all the evidence was in. And we 2 sought advice at an early stage or -- when I say sought 3 advice, we had counsel involved in this case from a very 4 early stage. They were briefed and conferences had with 5 counsel from an early stage after charge. 6 Q. Yes. I think at least one counsel was instructed in the 7 March; is that right? 8 A. I think one counsel was originally instructed, who then 9 I think after the first appearance, it became clear that 10 he was not going to be able to do the trial, so the case 11 was transferred to another chambers and we had a QC and 12 very experienced junior counsel. 13 Q. Mr Smith? 14 A. We had Andrew Smith and Gordon Cole QC, yes. 15 Q. You have been asked about which if any of your 16 conversations with either the senior investigating 17 officer or the officer in the case might have prompted 18 the comment in your statement about resources in effect. 19 A. Yes. 20 Q. I would just like to tell you what Mr Cousen said about 21 the conversation on the 26th to see if it accords with 22 your recollection. 23 A. Okay. 24 Q. Please say if it doesn't. 25 A. I will.</p> <p style="text-align: center;">Page 44</p>

<p>1 Q. Around the 26th, he remembered discussing with you the 2 fact that, potentially, the police would be deploying 3 resources the following week. Potentially firearms and 4 also surveillance. 5 The point of chatting with you in part was to say, 6 well, I need to go back and speak to my officers who 7 will want to know whether the -- 8 A. My supervising officers, yes, it would have been his 9 supervising officers. 10 Q. Yes, will want to know whether the threshold test has 11 been passed, because that might effect whether or not to 12 deploy assets? 13 A. Absolutely, yes. 14 Q. That seems to accord with what you were saying? 15 A. Yes. 16 Q. Is that the only conversation you can recall with 17 DI Cousen about resources? 18 A. I only ever recall one conversation, yes. 19 Q. Thank you. 20 You have also been asked about tipping points. 21 A. Yes. 22 Q. As an expression, "tipping points", that can, as you 23 have indicated, relate to the tipping point for 24 an arrest -- 25 A. Yes.</p> <p style="text-align: center;">Page 45</p>	<p>1 that it was a more general conspiracy without any 2 particular targets being mentioned throughout the 3 conspiracy period and taking in Culcheth, but 4 specifically in relation to Stoke-on-Trent, 5 a conspiracy -- they were accepting or would have 6 accepted that their intention was to steal from the 7 Citroen garage, which was a dealership near the G4S 8 depot. 9 Q. Yes, could I ask you to look at tab 3 in the bundle of 10 documents in front of you, which is the transcript of 11 an interview, I think at the request of Greater 12 Manchester Police, in 2014. 13 A. Yes. 14 Q. When you were asked a series of questions and then that 15 formed the basis of a subsequent witness statement. 16 A. Yes, okay. 17 Q. Do you recall that process happening? 18 A. Yes. 19 Q. You were asked by an Officer Preston, and it is page 160 20 of that transcript, please, about the pleas and you 21 say -- it is about halfway down the page, so if you get 22 your bearings, there is an answer at 18.30. You said 23 you were on leave and there were negotiations? 24 A. Yes. 25 Q. Your understanding was initially you were not sure of</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. -- or it can relate to the tipping point in terms of 2 evidence for a charge? 3 A. Yes. 4 Q. Sometimes, in fact, they are one and the same, as things 5 turn out? 6 A. Potentially, yes. 7 Q. Can I just ask you about one more area. 8 A. Yes. 9 Q. That's in relation to the trial itself. I know that you 10 were not present in that first week of the trial because 11 you were -- 12 A. I think initially, no, I wasn't, I was on holiday, but 13 I was on the end of the phone, constantly. 14 Q. I would just like to ask you about the pleas which you 15 understand were being offered. 16 A. Yes. 17 Q. The defence at trial in relation to Stoke was that 18 a Citroen garage was going eyed up for theft of Citroen 19 or other motor vehicles. 20 A. Yes. 21 Q. In terms of the pleas that were offered, can you recall 22 whether pleas were offered in respect of motor vehicles 23 and then subsequently cash or one or the other? 24 A. I don't recall there being any offers in relation to 25 cash. My understanding of the offers put forward was</p> <p style="text-align: center;">Page 46</p>	<p>1 the form of the offer, whether it was formal, but 2 certainly offers were made. All three would plead to 3 conspiracy to steal but they were saying they were 4 stealing or wanting to steal cars. 5 A. Yes. 6 Q. That accords with your recollection? 7 A. Yes, it does. 8 Q. "I can't remember what kind of garage it was, it was 9 a used garage, and I think it was Citroen, somewhere 10 near the G4S depot in Stoke." 11 And they were saying that is what they were there to 12 steal? 13 A. Yes. 14 Q. You confirm you were not involved. You said that didn't 15 sit with your case, because they were out to get G4S 16 vans in Stoke. That is what they were doing on the 17 industrial estate and looking for a Citroen car did not 18 sit well with what they were doing, and they were 19 driving much more expensive cars anyway. It just didn't 20 seem to work? 21 A. It didn't sit on all fours with our case. 22 Q. No. And then could you turn over the page. You say 23 there was then a discussion that there would -- you 24 would need to speak to Kevin Rogers, as to what was 25 formally offered, but that was rejected, ie the cars?</p> <p style="text-align: center;">Page 48</p>

<p>1 A. It was. 2 Q. "And there was a suggestion that they may plead again to 3 a conspiracy to steal. It was only ever a conspiracy to 4 steal that they were going to plead to, but in relation 5 to Group 4 vans or a Group 4 van. And again that didn't 6 sit with our facts." 7 Does that ring any bells now? 8 A. It doesn't, no. I think I have said there I would need 9 to check with Kevin Rogers. 10 Q. Yes. 11 A. I don't specifically -- I know we certainly would have 12 had discussions ourselves around G4S and how 13 a conspiracy to steal could fit in with that, but 14 I don't think that was formally offered. I wasn't 15 involved in the offers that were made. That was dealt 16 with ultimately -- I spoke to Kevin Rogers. I know it 17 went to our chief crown prosecutor at the time and it 18 was agreed with, I think, a detective chief 19 superintendent, it was agreed that we wouldn't accept 20 the pleas that were offered. 21 Q. No, and we can see part of the intellectual reasoning 22 for that I think a little further in your reply, because 23 whatever prompted consideration of it, whether it was 24 tentative discussions, informal offer, formal offer or 25 whatever, you remark, "You cannot steal from a Group 4</p> <p style="text-align: center;">Page 49</p>	<p>1 THE CHAIRMAN: Then a conspiracy also but just general in 2 relation to Culcheth; is that what you are saying. 3 A. My understanding was that it was a more general 4 conspiracy to steal. I don't remember any specific 5 targets being alluded to around the Culcheth area but it 6 would have included -- 7 THE CHAIRMAN: A single plea to conspiracy to steal -- 8 A. Yes. 9 THE CHAIRMAN: -- to some extent particularised in relation 10 to Stoke but not in relation to Culcheth? 11 A. Absolutely. Yes. 12 THE CHAIRMAN: I just wanted to understand what you were 13 saying. 14 MR BEER: Thank you, sir. 15 THE CHAIRMAN: Mr Weatherby. 16 MR WEATHERBY: Would you just give me a moment, please. 17 THE CHAIRMAN: Yes. 18 MR BEER: Just forgive me one moment. Mr Weatherby does 19 raise a point. 20 THE CHAIRMAN: Yes. 21 Further questions from MR BEER 22 MR BEER: It is a fair point Mr Weatherby raises. 23 If you just look at tab 5 and see whether this helps 24 you jog your memory. 25 A. Yes.</p> <p style="text-align: center;">Page 51</p>
<p>1 van because there has to be some element of force", so 2 in effect there was something artificial about accepting 3 a plea to conspiracy to steal cash when, by its very 4 nature, such criminality is almost always accompanied by 5 force or the threat of force? 6 A. I don't know what the pleas were that were put forward. 7 Whether -- my understanding is that the pleas that were 8 put forward related -- the formal pleas that were 9 offered were purely in relation to the Citroen car 10 garage and a general conspiracy to steal but without 11 giving any particular targets, apart from the Citroen 12 garage. It may well have been that any discussion 13 surrounding the G4S van was internal discussions within 14 the prosecution team. 15 Q. But you don't know? 16 A. It wouldn't have fitted. 17 MS WHYTE: No. 18 Thank you very much. Thank you. 19 MR BEER: Sir, I haven't any other questions, thank you. 20 THE CHAIRMAN: Can I just clarify that. 21 Questions from THE CHAIRMAN 22 THE CHAIRMAN: You were talking about the formal offer you 23 understood was the conspiracy to steal cars from the 24 Citroen garage, that is in relation to Stoke? 25 A. Yes.</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. This is the statement of Mr Rushton, the deputy chief 2 crown prosecutor. 3 A. Yes. 4 Q. At the foot of the first page he says: 5 "I can recall that the trial of Totton, Travers and 6 Rimmer took place in September 2012 in Crown Court in 7 Manchester. The prosecution was led by Mr Cole. I can 8 recall at the outset of the trial at least some of the 9 defendants were prepared to offer a plea of guilty to 10 an offence of conspiracy to steal. The basis of this 11 plea was they were in the relevant supermarket car park 12 with a view to stealing cars rather than as the 13 prosecution allege, to attack cash in transit vehicles." 14 A. Yes. 15 Q. Can you remember that being part of the discussion, 16 appreciating you were on annual leave and on the end of 17 a phone? 18 A. My understanding is that that would not be correct 19 because the -- my understanding was that the conspiracy 20 to steal the cars was from the Stoke area, not from the 21 Culcheth area. That is my understanding. I don't think 22 Mr Rushton was involved in that decision-making process, 23 it went from Kevin Rogers to our chief crown prosecutor. 24 Q. Were you involved in the decision making? 25 A. No.</p> <p style="text-align: center;">Page 52</p>

1 Q. We have got two people who were not involved in the
 2 decision making then, Mr Rushton and you?
 3 **A. Absolutely, yes. I wasn't, I received the initial**
 4 **phone call from court but because I knew -- clearly it**
 5 **was an important case, clearly it was a sensitive case,**
 6 **it was something that I needed to go straight to**
 7 **Mr Rogers about which I did, and it then went further up**
 8 **the line from him.**
 9 Q. Important because of the seriousness of the allegations?
 10 **A. Yes.**
 11 Q. And sensitive because somebody had been shot?
 12 **A. Yes, absolutely.**
 13 MR BEER: Thank you very much.
 14 THE CHAIRMAN: Thank you. That is the end of the evidence
 15 and you are free to go. Thank you for helping the
 16 Inquiry.
 17 Would that be a sensible point to make a break.
 18 MR BEER: Sir we have plenty of time today. We are not
 19 under any great time pressure.
 20 THE CHAIRMAN: In that case I will say midday.
 21 (11.48 am)
 22 (A short adjournment)
 23 (12.14 pm)
 24 THE CHAIRMAN: Can I apologise to everybody for extending
 25 the break. It was entirely my fault that we were not

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1 ready to start when I said we would be.
 2 Yes, Mr Beer.
 3 MR BEER: Mark Callaghan, please.
 4 MR MARK CALLAGHAN (sworn)
 5 THE CHAIRMAN: Thank you, Mr Callaghan. Do sit down.
 6 **A. I think I might -- I will remain standing at the moment.**
 7 **Questions from MR BEER**
 8 MR BEER: Mr Callaghan, my name is Jason Beer and I ask
 9 questions with Ms Cartwright on behalf of the Inquiry.
 10 In front of you there in a folder I think there is
 11 probably a single document, a witness statement dated
 12 4 December 2014 in your name. Can you just have a look
 13 at that, please, the first tab.
 14 **A. Yes.**
 15 Q. Are the contents of that witness statement true to the
 16 best of your knowledge and belief?
 17 **A. They are.**
 18 Q. Thank you very much. Can you just tell us something
 19 about yourself from a legal or lawyering perspective.
 20 Are you a solicitor or barrister?
 21 **A. I am a solicitor.**
 22 Q. When were you admitted to the role?
 23 **A. 1986.**
 24 Q. Do you currently work for the CPS?
 25 **A. I do.**

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1 Q. When did you first start working for the CPS?
 2 **A. 1986.**
 3 Q. Right. What was your position in late 2011/early 2012?
 4 **A. I was the lawyer/manager on a Crown Court unit based in**
 5 **Manchester.**
 6 Q. Were you a district crown prosecutor?
 7 **A. Yes.**
 8 Q. Was Nicky Moore, Nicola Moore, one of your team?
 9 **A. She was.**
 10 Q. How many people did you manage?
 11 **A. Approximately 20, I would say at that time.**
 12 Q. Was one of the functions of you and the lawyers under
 13 you to advise the police service during the course of
 14 an investigation?
 15 **A. Yes.**
 16 Q. Including pre-charge?
 17 **A. If the investigation merited it, yes.**
 18 Q. It is fair to say that probably wasn't your principal
 19 function?
 20 **A. No.**
 21 Q. Such advice pre-charge, did that sometimes involve
 22 evidential sufficiency?
 23 **A. Yes.**
 24 Q. What were the boundaries if any in relation to the
 25 advice that the CPS gave on operational decision making

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1 by the police service?
 2 **A. Sorry, I don't really understand.**
 3 Q. Yes. In relation to pre-charge advice --
 4 **A. Yes.**
 5 Q. -- would you advise on operational matters?
 6 **A. No, generally we would -- the police would come to us**
 7 **when an investigation was complete. They would submit**
 8 **a file to us and we would consider it in terms of**
 9 **whether there was sufficient to charge and whether it**
 10 **was in the public interest to prosecute. In more**
 11 **complex cases, the police may come to us during the**
 12 **investigation for what we would term investigative**
 13 **advice, but, by and large, most cases came to us at the**
 14 **close of the investigation for a charging decision.**
 15 Q. In general terms, when would they come to you for
 16 investigative advice?
 17 **A. It would be if there were large operations, often if**
 18 **they were anticipating quite a few defendants and they**
 19 **wanted our advice, so that we had somebody on standby to**
 20 **authorise charges on the day of arrest, or in more**
 21 **complex operations involving drugs or conspiracies, so**
 22 **they may ask for a lawyer to be allocated to them to**
 23 **give advice during an investigation.**
 24 Q. What did being allocated to a case at the pre-charge
 25 investigative stage involve?

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1 **A. The lawyer would be basically the point of contact at**
 2 **the CPS for the police and the police would speak to**
 3 **them and seek advice as and when they saw fit.**
 4 Q. What records were kept or supposed to be kept of the
 5 advice that was given?
 6 **A. At that time we operated probably on paper, back in**
 7 **2012, and now we work much more digital and our case**
 8 **systems will contain notes, they are entered on to our**
 9 **computerised system. In those days, if there were**
 10 **significant meetings held during the course of**
 11 **investigations, notes may be kept of them.**
 12 Q. That would just be what, in your daybook or in your
 13 counsel's notebook?
 14 **A. In a notebook, yes.**
 15 Q. There was not a file or anything built for investigative
 16 advice in relation to a specific case?
 17 **A. No, not at that time.**
 18 Q. It would be whatever bit of paper you happened to have?
 19 **A. Yes, I mean if the investigation was complex, somebody**
 20 **may keep one notebook for notes of discussions they may**
 21 **have done. Just so that everything was in one place.**
 22 Q. Right. To what extent did you, as the line manager of
 23 the 20 under you become involved in such investigative
 24 advice?
 25 **A. Well, I was more responsible for effectively allocating**

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1 **the cases to the lawyers, so if the police rang up and**
 2 **said, "We would like somebody to be allocated this, it**
 3 **is a drugs operation", for instance, "We are planning**
 4 **a strike day on such and such", I would allocate it and**
 5 **perhaps set up a meeting between the lawyer and the**
 6 **police.**
 7 **If the lawyer then wanted to discuss the**
 8 **investigation with me further, you know, in terms of any**
 9 **legal decisions to be made, I would be available for**
 10 **that. They may do, they may not. It certainly wasn't**
 11 **the case that they would always speak to me.**
 12 Q. Okay. Do you remember Nicola Moore was allocated as the
 13 lawyer for Operation Shire?
 14 **A. Yes. I can't recall whether I allocated the case to**
 15 **Nicola or whether it was one where she was approached**
 16 **directly by the police, which sometimes happens, and she**
 17 **asked me if she could be allocated the case but yes,**
 18 **I do recall that.**
 19 Q. Do you remember when that was, either way round that it
 20 was, either you allocated or she picked it up and you
 21 ratified the decision?
 22 **A. It would have been early 2012, I think.**
 23 Q. Do you have any contemporaneous records of any meetings
 24 or discussions with Mrs Moore that you had about
 25 Operation Shire?

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1 **A. No.**
 2 Q. Have you any communications with her by email or
 3 otherwise in relation to Operation Shire that you are
 4 aware of?
 5 **A. I doubt it now.**
 6 Q. Did you ever become involved in giving advice in
 7 relation to Operation Shire?
 8 **A. Not to the police, no. I didn't speak -- I don't recall**
 9 **speaking to the police directly. It is possible I may**
 10 **have done but I don't recall. I do recall speaking to**
 11 **Nicky about the case.**
 12 Q. If we could open up, please, bundle K, you are going to
 13 be helped.
 14 Thank you, Ms Curran.
 15 K/1195, please.
 16 Just to help you, if you go back a page you will see
 17 this is a note of 26 January 2012 --
 18 **A. Yes.**
 19 Q. -- at the top. I think if you go back to 1195, at the
 20 foot of the page, the second two dashes we are dealing
 21 with, this is a note in DI Cousen -- the senior
 22 investigating officer for Operation Shire's casebook.
 23 He says:
 24 "Speak to [or spoke to] Nicky Moore, who has in turn
 25 spoke to Mark Callaghan about this case."

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1 Can you remember Nicky Moore speaking to you on or
 2 about 26 January 2012?
 3 **A. I couldn't remember the date --**
 4 Q. No.
 5 **A. -- I do recall speaking to Nicky on, probably, well,**
 6 **certainly more than three or four occasions --**
 7 Q. Okay.
 8 **A. -- about the investigation.**
 9 Q. Just tell us in general terms then, what was the
 10 content, and I am only interested at the moment in
 11 pre-3 March, what was the content of these discussions
 12 on more than three or four occasions?
 13 **A. I was aware through Nicky that the police were**
 14 **conducting surveillance on at least one suspect and had**
 15 **been following that suspect to Stoke, or the Stoke area.**
 16 Q. Yes.
 17 **A. And I think they had followed him on more than one**
 18 **occasion.**
 19 Q. Yes.
 20 **A. And Nicky would, or I would ask Nicky, had anything**
 21 **happened perhaps in relation to that and she had advised**
 22 **me that, yes, the police had followed somebody to Stoke.**
 23 **I was aware on one occasion, I think she advised me and**
 24 **after that, we were under the impression that the police**
 25 **were continuing to watch this particular person, so**

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1 I was interested in whether there were any further
 2 visits to Stoke, or any further surveillance, and I did
 3 ask her, and I think there was at least one further trip
 4 there.
 5 Q. Can you recall her communicating to you what her advice
 6 was on whether the threshold test had been passed?
 7 A. I don't recall her specifically saying, "Oh, the
 8 threshold test is not met". I do recall discussions
 9 between us that, at that stage, the only evidence which
 10 we were aware of was that a male had been followed and
 11 was seen parked up, I think in the early hours of the
 12 morning outside a -- or watching, we thought. He was
 13 not actually parked I don't think directly outside but
 14 he was parked somewhere in view of, we were told, a G4S
 15 depot, but that was the extent of what the surveillance
 16 had revealed at that stage.
 17 So we may well have had a conversation along the
 18 lines of, "Well, it is suspicious but, you know, I don't
 19 think at this stage there is enough evidence for us to
 20 take it anywhere".
 21 Q. You say in your statement, if we just open the statement
 22 up, in the second paragraph from the bottom:
 23 "I believe I spoke briefly to Kevin Rogers."
 24 Stopping there, who was Kevin Roger?
 25 A. He was my line manager.

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1 Q. "I spoke briefly to Kevin Rogers about the investigation
 2 on occasions, but cannot recall details of any specific
 3 conversations around that time. I am aware that Nicky
 4 was also speaking to Kevin about the investigation."
 5 Can you help us, Mrs Moore was speaking to the
 6 investigators, Mrs Moore was speaking to you and you
 7 were speaking to Kevin Rogers. Why were you speaking to
 8 Kevin Rogers?
 9 A. Only to keep him updated with what was going on, as far
 10 as I knew it. Kevin was my line manager. He took
 11 an interest in any cases, which, you know, may become
 12 particularly serious or where the police were involved
 13 in seeking investigative advice. Not every case but he
 14 did in this particular case. So I would just update him
 15 and I think Nicky was as well but I wasn't party to
 16 discussions between them.
 17 Q. What were you updating him about, can you now remember?
 18 A. Probably just what I had been told by Nicky. As I say,
 19 I don't recall having any direct conversations with the
 20 police about it, so I may have just chatted to him
 21 about, "Oh, yes, one of the subjects was seen going to
 22 Stoke again this morning". it would have been, or,
 23 "There is no further surveillance evidence" or whatever.
 24 I may have just updated him in those terms.
 25 Q. Okay. In the note that we were looking at, the

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1 26 January note -- sorry, it has gone away.
 2 A. Sorry.
 3 Q. That is all right.
 4 THE CHAIRMAN: 1195.
 5 MR BEER: K/1195.
 6 A. Yes.
 7 Q. In the second part of the lower entry, DI Cousen
 8 records:
 9 "She has reviewed the information that I have
 10 provided to her verbally and advised that the case is on
 11 the cusp of passing the threshold test. Much would
 12 depend on what items are in the car. Weapons, face
 13 coverings, means of communication, et cetera."
 14 Then over the page:
 15 "If the OCG are observed watching a van or indeed
 16 start to follow a van, then this greatly strengthens the
 17 case and will pass the investigation through the
 18 charging threshold. Advised I would update her further
 19 as the case progresses."
 20 Was Ms Moore's advice communicated to you in those
 21 terms?
 22 A. Well, I wasn't party to that conversation --
 23 Q. No.
 24 A. -- I can't recall specific conversation with Nicky about
 25 what additional evidence would be required for the case

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1 to pass the threshold test. This, the reference here
 2 to, "It would depend on what items were in the car,
 3 weapons, face coverings, methods of communication",
 4 I don't recall speaking to Nicky about that.
 5 Q. Okay.
 6 The second record of advice that we have -- we can
 7 put that file away now.
 8 A. Thank you.
 9 Q. It is at file W, page 430, please.
 10 Can you see at the foot of the page there, there is
 11 an email from Andrew Talbot, who was the officer in the
 12 case, to Mrs Moore, and he says:
 13 "Nicky, I have attached a current MG3 in relation to
 14 Operation Shire and in particular the Totton side of the
 15 operation. I am currently reluctant to create an open
 16 ICIS case history due to the nominals involved and the
 17 covert nature of the investigation. I am only sending
 18 this now in case we need to approach a firearms team for
 19 further assistance, as the superintendent will always
 20 ask if there is enough evidence to arrest and charge at
 21 present. If you have anything further to ask then don't
 22 hesitate to contact me on either of the numbers below."
 23 Then if you go back to page 430, from the middle of
 24 the page, or by the second hole-punch Mrs Moore replies
 25 on 21 February, so the next day, the next morning,

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<p>1 saying: 2 "If you are content with an email then I am happy 3 not to put on ICIS. In any event ..." 4 A. Sorry, where? 5 Q. 430, second hole-punch. Email, 21 February at 8.25. 6 A. Sorry, yes. Sorry. 7 Q. Okay: 8 "If you are content with an email then I am happy 9 not to put on ICIS. In any event, we could get away 10 with not doing it on ICIS by saying that it doesn't pass 11 the threshold test." 12 The "TT", yes? 13 A. Yes. 14 Q. This is Mrs Moore I think advising that the case as set 15 out in the MG3 does not pass the threshold test. Were 16 you involved in this decision at all? 17 A. I don't recall being involved in that decision. 18 Q. Okay. 19 We can put that away then. 20 Then on the last occasion that we have a formal 21 record of advice, it is probably easiest if we do it in 22 Nicola Moore's witness bundle, please, which is just 23 here, at tab 10. 24 This is in DC Talbot's casebook. If you look at the 25 second page in that tab for 1 March 2012, 10.45, he has</p> <p style="text-align: center;">Page 65</p>	<p>1 somewhere else or they had been seen somewhere else but 2 not doing anything more than just visiting the area, 3 "I still don't think it is -- it passes the threshold 4 test, what do you think?" We may have had 5 a conversation like that but my involvement would have 6 been as brief as that, really. 7 Q. Can you recall any discussion over advice being given 8 that the subjects needed to have weapons and/or relevant 9 clothing? 10 A. No. I didn't -- I don't recall speaking to Nicky 11 specifically about what we did need in addition to the 12 visits to the particular depot or the premises which 13 were thought to be the subject of a potential offence. 14 I certainly don't recall saying to her, "We need to go 15 back to the police and say they need to have face 16 coverings, weapons, methods of communication ..." 17 Q. Did you ever become involved, in the context of this 18 case, with the discussion with the police, or 19 a discussion with Nicky Moore, about tipping points? 20 A. Only after the case had been finalised, I was contacted 21 about a year later. Or I think six or seven months 22 after the case had been finalised. At that time Nicky 23 was on maternity leave and Kevin Rogers had left the 24 CPS. I received an email from somebody at the IPCC -- 25 Q. Yes.</p> <p style="text-align: center;">Page 67</p>
<p>1 recorded that: 2 "He spoke to Nicky Moore and discussed the recent 3 events regarding the Audi travelling to the St Helens 4 area on 21 February 2012 and the events of last night, 5 where the Audi travels to Culcheth with Totton and 6 Grainger and then returns when Totton places the hacksaw 7 into the boot of his Audi. Due to the in fact that the 8 areas visited, Stoke, St Helens and Culcheth have been 9 ..." 10 THE CHAIRMAN: "Visited". 11 MR BEER: "Visited", thank you: 12 "... at times when premises are closed and nothing 13 more than any 'preparatory activity' has taken place 14 then there would insufficient evidence to charge with 15 any substantial offences, subjects need to have weapons, 16 relevant clothing (gloves and balaclavas)." 17 Were you consulted in relation to that, or spoken to 18 about that advice? 19 A. I don't think so. I don't -- I mean my recollection, 20 I think, from the statement, was very much around the 21 early part of the visit to Stoke. I was aware that 22 another area had been visited. I can't remember now 23 whether it was the St Helens or Culcheth. I don't 24 remember speaking to Nicky specifically on 1 March about 25 this, she may have spoken to me and said they had been</p> <p style="text-align: center;">Page 66</p>	<p>1 A. -- and that I think was talking about tipping points, 2 I know it was I think exhibited by me. I haven't seen 3 that email for some time. 4 Q. I will try and help you. In Mrs Moore's file at tab 4, 5 if we start right at the beginning, which is I think 6 three pages from the back. Page 1768. 7 A. Yes. 8 Q. Can you see an email from Stephen Liston, an IPCC 9 investigator, to Neil Nehra? 10 A. Yes. 11 Q. Is Mr Nehra a crown advocate? 12 A. He is, yes. 13 Q. Or was he? 14 A. He was -- well, no, he still is. 15 Q. The first email in the chain says: 16 "Thanks for your help this morning. As discussed 17 this email outlines my inquiry with the CPS. I am 18 currently working on an investigation into a fatal 19 shooting. The shooting occurred during the arrest phase 20 of GMP's Operation Shire, a case where Nicky Moore was 21 the reviewing officer. During the course of 22 Operation Shire, Nicky provided advice to the SIO, 23 DI Cousen, and in particular during the covert phase of 24 the operation provided him with tipping points for his 25 guidance to move to an arrest phase during live</p> <p style="text-align: center;">Page 68</p>

<p>1 surveillance. GMP and DI Cousen have provided details 2 of the tipping points as they understood them but for 3 completeness I was looking to meet with Nicky to discuss 4 the tipping points and ultimately for complete clarity 5 confirm that the tipping points advised by her are the 6 same as those provided to the IPCC to GMP. In view of 7 Nicky's absence from work I would be obliged if you 8 could make an enquiry." 9 Mr Nehra forwards that to you on 11 April, if you 10 look at the top of 1768. 11 A. Yes. 12 Q. And says, as well as forwarding the email: 13 "It was a case that Nicky was involved in. Nicky is 14 of course on leave now about but the officer wished to 15 discuss the points below. I have no knowledge of this 16 case, but given Nicky now being away I stated I would 17 forward the email to you. We can then perhaps allocate 18 or more likely speak to Nicky to see if she knows what 19 this is a reference to." 20 Yes? 21 A. Yes. 22 Q. Then if we go to page 1766, you reply to Mr Liston and 23 ask: 24 "Is there a document containing these tipping points 25 that I could see? Does DI Cousen recall if anyone else</p> <p style="text-align: center;">Page 69</p>	<p>1 Yes? 2 A. Yes. 3 Q. You reply on 1764, middle of the page: 4 "Sorry for the delay in responding, I am Nicky's 5 line manager and I don't recall her discussing this 6 particular topic with me. She may have consulted the 7 branch crown prosecutor, Kevin Rogers, but he has now 8 left." 9 Yes? 10 A. Yes. 11 Q. "I will try and get in contact." 12 A. Yes. 13 Q. If we go on to 1760, at the foot of the page, the last 14 relevantly in the chain, from Mr Rushton, was he the 15 deputy chief crown prosecutor at this time for the 16 north-west area? 17 A. He was, yes. 18 Q. He explains who he was and then, over the page, on the 19 third paragraph he says: 20 "As you were aware, Nicky Moore, the reviewing 21 lawyer, is currently on maternity leave but her line 22 manager Mark Callaghan to whom your original email was 23 addressed has managed to speak with her last week and 24 Kevin Rogers, and I would inform you that neither of 25 them can recall any agreement with the relevant DI,</p> <p style="text-align: center;">Page 71</p>
<p>1 was involved in giving this advice?" 2 Yes? 3 A. Yes. 4 Q. If we go to 1764, Mr Liston replies: 5 "Thank you for your prompt reply. I do not have 6 a specific formal document with the tipping points 7 listed. However from information gleaned from GMP and 8 DI Cousen, the tipping points as they understood them 9 were ..." 10 Then he sets them out, one to four. In fact those 11 are tipping points used for a previous deployment, not 12 the one on 3 March. He then says, on the top of 1766: 13 "The tipping points could be applied individually or 14 together. My information is that the SIO, DI Cousen, 15 spoke with the CPS, Nicky Moore, on 26 January 2012 and 16 was aware that she in turn had spoken to her line 17 manager." 18 I think is that is the reference that we had seen in 19 that notebook I showed you? 20 A. Yes. 21 Q. "I also believe that a DC Talbot also spoke with the CPS 22 in March 2012." 23 I think that is a reference to the third thing 24 I showed you, the notebook from DC Talbot: 25 "I hope this assists."</p> <p style="text-align: center;">Page 70</p>	<p>1 DI Cousen, about tipping points as suggested. Indeed 2 they recall, as does Mark Callaghan, that the CPS 3 stressed to GMP that it would always be an operational 4 police decision when to arrest and would not by one for 5 the CPS to become involved with." 6 Firstly there, breaking it down. It says in the 7 last sentence there: 8 "Indeed they recall, as does Mark Callaghan, that 9 the CPS stressed to GMP that it would always be 10 an operational police decision." 11 Did you stress to GMP that it would always be 12 an operational police decision. 13 A. I personally didn't, no. 14 Q. Are you aware of anyone else, in particular Ms Moore, 15 stressing to GMP, that a decision to arrest would always 16 be an operational police decision? 17 A. Well, I can't -- I wasn't party to any conversation when 18 that was said by Nicky. My recollection from speaking 19 to both Nicky and Kevin Rogers following that email was 20 that, if there was any mention of tipping points, then 21 the police were told that that was always an operational 22 decision for them and it wasn't something that we would 23 advise them upon. 24 Q. You see the way this is written here, and I appreciate 25 this is somebody else's email --</p> <p style="text-align: center;">Page 72</p>

1 **A. Yes.**
 2 Q. -- aside from the conversation that you had with
 3 Nicky Moore, it is suggesting that Nicky Moore,
 4 Kevin Rogers and you recalled that the CPS stressed to
 5 GMP it would always be an operational police decision as
 6 to when to arrest. Can you recall at all when that
 7 topic even came up for discussion?
 8 **A. Well, as I said to you before, the first mention of**
 9 **tipping points I was aware of was when that email came**
 10 **from Steve Liston in April.**
 11 Q. The way this is written is you were talking about
 12 something that had happened beforehand, not that this is
 13 the first time anyone has ever mentioned tipping points
 14 check?
 15 **A. No, I mean my first response to Steve Liston was that it**
 16 **was not something Nicky hadn't discussed with me.**
 17 **I don't know why my name is included in that particular**
 18 **email. It may be -- I may have misinformed Mr Rushton**
 19 **or it may have been a misunderstanding on his part, but**
 20 **I don't certainly recall having had any conversation**
 21 **with the police about tipping points and I wasn't aware**
 22 **that Nicky or Kevin had been involved in it, which is**
 23 **why I contacted them both following the receipt of the**
 24 **email from Steve Liston.**
 25 Q. When you spoke with Nicky Moore, what did she tell you?

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1 Appreciating this is three years ago.
 2 **A. Yes. My recollection, I think it is -- my recollection**
 3 **was that if there was, that both she and Kevin said that**
 4 **if there was ever any decision to be made in terms of at**
 5 **what point arrest was appropriate, that was**
 6 **an operational decision for GMP, it wasn't a decision**
 7 **for the CPS.**
 8 Q. That may be factually correct, but had they had that
 9 conversation with GMP?
 10 **A. I don't know. I can only go off what they told me and**
 11 **I don't know. Certainly they said -- it would suggest**
 12 **in this email that they had said there had been**
 13 **a mention of tipping points and they had told the police**
 14 **that is your decision.**
 15 Q. Over to you, not for us?
 16 **A. Yes, that is to you, yes.**
 17 Q. Okay.
 18 Can we just look at your witness statement, please,
 19 which is tab 1 of your bundle.
 20 **A. Yes.**
 21 Q. On the second page, the last paragraph, dealing with the
 22 same event, you say:
 23 "I then rang Nicky Moore and Kevin Rogers to ask
 24 them whether they recalled any agreement as to tipping
 25 points during the investigation. I did not make any

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1 notes of those phone calls, but to the best of my
 2 recollection both Nicky and Kevin stated that there had
 3 been no agreement reached with the police regarding
 4 tipping points ..."
 5 Then this:
 6 "... and that their advice was that the decision as
 7 to when to arrest would always be an operational
 8 decision for the police."
 9 That again suggests, doesn't it, it is not just
 10 Mr Rushton's email, it again suggests that they were
 11 telling GMP at the time, "The decision when to arrest is
 12 down to you and not for us to advise on"?
 13 **A. Yes.**
 14 Q. I suppose when you made this witness statement
 15 in December 2014, you had Mr Rushton's email in front of
 16 you, didn't you?
 17 **A. Yes, I would have thought so.**
 18 Q. Well, you produce it, if you look at the last paragraph.
 19 **A. Yes, yes, I do exhibit the email chain so I would**
 20 **imagine I had the email with me, yes.**
 21 Q. Do you think when you were writing this in your
 22 paragraph of your statement you were writing what was in
 23 Mr Rushton's email, or is that independent recollection?
 24 **A. Mr Rushton's email was based on the conversations I had**
 25 **had by telephone with Kevin Rogers.**

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1 Q. We have gone full circle now, actually.
 2 What I am saying is that what is in Mr Rushton's
 3 email is the same as what you have said in the statement
 4 here. I am asking is it because you had Mr Rushton's
 5 email in front of you when you are writing your
 6 statement and you are just writing out what is in
 7 Mr Rushton's email or is it some independent
 8 recollection you have?
 9 **A. No, well, I recalled having the conversation with**
 10 **Nicky Moore and Kevin Rogers in April 2013 and I then**
 11 **passed that information on to Mr Rushton. As a result**
 12 **of that information, he responded to Mr Liston.**
 13 **I had Mr Liston's -- or the email in front of me**
 14 **when I made the statement but I can independently recall**
 15 **the part of the conversation about tipping points, that**
 16 **it was an operational decision for the police. That was**
 17 **what Kevin and Nicky both told me that they had said.**
 18 MR BEER: Thank you very much indeed, Mr Callaghan.
 19 MR THOMAS: No, sir.
 20 THE CHAIRMAN: Thank you.
 21 Thank you, Mr Callaghan, that is the end of your
 22 evidence, thank you for assisting the Inquiry. You are
 23 free to go now.
 24 Yes.
 25 MR BEER: Sir, I would ordinarily move to

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<p>1 Superintendent Ellison now, I think he is a Chief 2 Superintendent now. I wonder whether we could break now 3 until 2.00. If that suits you because we have, I know, 4 some other business to deal with ourselves. 5 THE CHAIRMAN: Right. Yes. 6 Certainly. 2.00 then. 7 (12.48 pm) 8 (The Luncheon Adjournment) 9 (2.02 pm) 10 MR BEER: Stuart Ellison, please. 11 MR STUART ELLISON (sworn) 12 THE CHAIRMAN: Feel free to sit down if you would like to. 13 A. Thank you. 14 Questions from MR BEER 15 MR BEER: Chief Superintendent, I think it is Chief 16 Superintendent -- looking at your shoulders. 17 A. It is, yes, thank you. 18 Q. My name is Jason Beer and I ask questions on behalf of 19 the Inquiry, alongside Ms Cartwright, in front of you 20 there should be a folder, a white folder. In that 21 folder there should be two witness statements, the first 22 of them at tab 1, dated 19 October 2012. 23 Can you see that in your name? 24 A. I can, yes. 25 Q. Thank you. Then in tab 2, a witness statement dated</p> <p style="text-align: center;">Page 77</p>	<p>1 A. Yes, and I had volunteered to take a -- for training to 2 take a role on the firearms command cadre. 3 Q. The firearms cadre, is that part of a rota of 4 superintendent and I think chief inspector ranks, who 5 perform the function of a tactical firearms commander or 6 a silver in firearms deployments? 7 A. Yes, it is open to the rank of chief inspector and above 8 for volunteers to be trained, yes. 9 Q. By January 2012, how long had you been a tactical 10 firearms commander? 11 A. Just a year, fully accredited for about a year at that 12 point. 13 Q. You had qualified in early 2011? 14 A. Yes. 15 Q. Before that, what, if any, firearms roles had you 16 performed? 17 A. I hadn't had any live firearms roles. I had previously 18 been trained in my last force as a firearms commander, 19 but transferred forces before I could be accredited so 20 I had retrained effectively when I came to GMP. 21 Q. You had been a TFC in a previous force? 22 A. Yes. 23 Q. Had you performed any other firearms roles in that 24 previous force? 25 A. No.</p> <p style="text-align: center;">Page 79</p>
<p>1 17 October 2014. Is that right? 2 A. Yes, it is, yes. 3 Q. Are the contents of both of those statements true to the 4 best of your knowledge and belief? 5 A. Yes, they are, yes. 6 Q. Thank you very much. Can I start with some background 7 about you, when did you join the police service? 8 A. Late 1993. 9 Q. In January 2012, I think you held the rank of 10 superintendent. Is that right? 11 A. That's right, yes. 12 Q. You have obviously since been promoted to chief 13 superintendent. 14 At that time were you posted to GMP's north 15 Manchester division. 16 A. I was, as the superintendent responsible for the city 17 centre, yes. 18 Q. You also held a role as a tactical firearms commander, 19 is that right? 20 A. That's right, yes, in addition to my core role, yes. 21 Q. That had nothing directly to do with your core role, 22 your day job, if you like? 23 A. No, no. 24 Q. Your day job was territorial policing of part of 25 Manchester city centre?</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. Is it a necessary part of being a TFC to have had 2 operational experience, either as an operational 3 firearms commander or an authorised firearms officer? 4 A. No it is not. The criteria -- it is more important that 5 you can demonstrate sound operational decision making. 6 Whether that is in the public order environment or in 7 other fields, it doesn't have to be firearms. 8 Q. Can you just keep your voice up a little bit, I know it 9 is difficult when you are sitting down but if you could 10 just keep your voice up a little bit. 11 A. Would it help if I stood? 12 Q. It is completely up to you, but whichever way you need 13 to keep your voice up. 14 In order to qualify as a TFC, what initial training 15 had you to undertake? 16 A. Initially, you volunteer and get assessed based on, as 17 I say, your track record of operational decision making. 18 If you are deemed fit then you would be selected and 19 sent on an initial firearms commanders course, which is 20 one week. That is pass or fail. 21 Q. Whereabouts is that? 22 A. They are held at licensed forces throughout the country. 23 Q. In your case, this was at your previous force was it? 24 A. No. Sorry, the initial course was actually on 25 my previous course, where I did the training at Lances</p> <p style="text-align: center;">Page 80</p>

<p>1 headquarters.</p> <p>2 Q. Yes.</p> <p>3 A. That course is pass or fail and if you pass you then go</p> <p>4 on to a pre-planned firearms command course, which is</p> <p>5 effectively the course for cadre commanders.</p> <p>6 Q. Yes.</p> <p>7 So you had undertaken or re-undertaken both of those</p> <p>8 on transfer to GMP?</p> <p>9 A. Yes.</p> <p>10 Q. Thank you.</p> <p>11 Had you undertaken any refresher training between</p> <p>12 early 2011 and January 2012?</p> <p>13 A. Well, when you finished the course you are deemed</p> <p>14 occupationally competent and you are not accredited to</p> <p>15 operate as a firearms commander, you then have to go</p> <p>16 through a period of mentoring and learning to become</p> <p>17 accredited as an occupational firearms commander, so</p> <p>18 I had worked through that occupational phrase.</p> <p>19 I had also undertaken continuous professional</p> <p>20 development workshops throughout the year, so I had been</p> <p>21 maintaining my professional learning throughout.</p> <p>22 Q. Does it follow that in your view, by January 2012 you</p> <p>23 were operationally and occupationally competent to</p> <p>24 perform the role of a TFC?</p> <p>25 A. Absolutely, yes.</p> <p style="text-align: center;">Page 81</p>	<p>1 reviewing officer there is shown as a Chief Inspector</p> <p>2 Ellison?</p> <p>3 A. Yes.</p> <p>4 Q. Can you confirm that is not you?</p> <p>5 A. That is not me.</p> <p>6 Q. That is a different Ellison?</p> <p>7 A. It is.</p> <p>8 Q. Did you have any role in the review or development of</p> <p>9 this SOP?</p> <p>10 A. No. None.</p> <p>11 Q. Equally, if we can look at 581 in the same bundle,</p> <p>12 please, which is a later iteration, the first one I took</p> <p>13 you to was October 2010, this is October 2011. Can you</p> <p>14 confirm, again, that that reviewing officer is not you,</p> <p>15 it is a different Ellison?</p> <p>16 A. That is a female Ellison, it is definitely not me.</p> <p>17 Q. Thank you very much indeed.</p> <p>18 That can be put away, thank you.</p> <p>19 Had you experience of a strategics firearms</p> <p>20 commander refusing an application made by you for</p> <p>21 authority to use MASTS by January 2012.</p> <p>22 A. No.</p> <p>23 Q. Had you made such applications by then?</p> <p>24 A. Yes. I had actually commanded a number of MASTS</p> <p>25 deployments.</p> <p style="text-align: center;">Page 83</p>
<p>1 Q. By that time, January 2012, how frequently did you</p> <p>2 perform the role of a TFC?</p> <p>3 A. The rota would put you on call as a firearms commander</p> <p>4 typically twice in any given month for a period of four</p> <p>5 days or three days, 12-hour shifts, so it would be</p> <p>6 fairly continuous throughout that year.</p> <p>7 Q. Would they always result in an application to you for</p> <p>8 a deployment?</p> <p>9 A. No, no, in fact most applications that came to me</p> <p>10 I would, my track record would show that more often than</p> <p>11 not I would consider the criteria for armed deployment</p> <p>12 not to be met in the risk assessment meetings that I had</p> <p>13 chaired.</p> <p>14 Q. By January 2012, what did you understand MASTS to be?</p> <p>15 A. MASTS is a mobile armed support to surveillance,</p> <p>16 effectively it is an armed contingency plan supporting</p> <p>17 unarmed surveillance officers who might be tracking</p> <p>18 a given nominal at that time.</p> <p>19 Q. Thank you very much. Can we look, please at K/574.</p> <p>20 That is not in your file I think but the bundle will be</p> <p>21 provided for you. 574, please.</p> <p>22 A. Yes.</p> <p>23 Q. Can you see, this is a SOP, SOP 8, for MASTS?</p> <p>24 A. Yes.</p> <p>25 Q. Can you turn over the page at 575. Can you see the</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. What were the additional criteria that you would need to</p> <p>2 satisfy in order for an SFC to authorise MASTS as the</p> <p>3 mode of deployment?</p> <p>4 A. I would need to satisfy the SFC that firstly the</p> <p>5 criteria for the deployment of armed officers had been</p> <p>6 met.</p> <p>7 Q. Yes.</p> <p>8 A. That would mean either establishing that officers were</p> <p>9 likely to come across someone in possession of or with</p> <p>10 the immediate access to a firearm, or were otherwise so</p> <p>11 dangerous that the deployment of armed officers was</p> <p>12 appropriate.</p> <p>13 Q. Yes.</p> <p>14 A. So firstly I would have to satisfy those criteria.</p> <p>15 Q. As a base station?</p> <p>16 A. As a base station for armed deployment, yes.</p> <p>17 In terms of MASTS as a tactic, it is what is</p> <p>18 determined an advanced firearms tactic. So I would need</p> <p>19 to convince the SFC that the options that I had worked</p> <p>20 through in the risk assessment meeting, to either be</p> <p>21 left with MASTS as a preferred tactic or not were</p> <p>22 appropriate and that, as a tactic, it is entirely</p> <p>23 proportionate to the level of threat we were facing.</p> <p>24 Q. Okay, those I understand are quite general answers.</p> <p>25 Was there any tipping point for the authorisation of</p> <p style="text-align: center;">Page 84</p>

1 MASTS as a mode of operation?
 2 **A. A tipping point is always discussed and it can vary from**
 3 **deployment to deployment, based upon the circumstances**
 4 **which is why I am giving a fairly general answer I am**
 5 **afraid.**
 6 Q. You have accurately, if I may say so, given two of the
 7 three grounds for satisfying an authority TO deploy
 8 AFOs. The third being irrelevant, destruction of
 9 animals.
 10 Was there an equivalent form of words or threshold
 11 that had to be met in order for MASTS to be selected --
 12 **A. No.**
 13 Q. -- as the mode of deployment?
 14 **A. No, no. It's -- the tactic would always be, certainly**
 15 **for myself, would always be discussed with a tactical**
 16 **adviser following the risk assessment meeting and we**
 17 **would work through which options in terms of tactical**
 18 **deployment were the most appropriate to that particular**
 19 **incident. There is no extra threshold required for**
 20 **a MASTS it just has to be the appropriate tactic.**
 21 Q. It was as a result of discussion between you, perhaps at
 22 the TAC, and the strategic firearms commander when you
 23 made the application, a question of evaluation and
 24 judgment by reference to the passing circumstances --
 25 **A. Yes.**

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1 Q. -- that determined whether or not it would be approved?
 2 **A. Yes.**
 3 Q. How frequently in this year period -- appreciating that
 4 you were at the start of it somebody at least in GMP
 5 young in service as a TFC -- when there was authority
 6 for an armed deployment was MASTS also authorised?
 7 **A. Well, within that year alone I had actually commanded**
 8 **a number of MASTS, as I have said. Some went through to**
 9 **a successful strike with the recovery of firearms,**
 10 **others we were not required to strike.**
 11 **Some of that actually I think is down to the very**
 12 **fact that we work in a large city force with a specific**
 13 **crime problem that other forces, smaller forces for**
 14 **example, might not have. So MASTS was used fairly**
 15 **regularly.**
 16 **Whether it was used more than other tactics, I don't**
 17 **know. I certainly would not suggest that I had seen it**
 18 **used inappropriately.**
 19 Q. You were the TFC in relation to an armed operation, part
 20 of Operation Shire, that operated from GMP and extended
 21 into Staffordshire on 25, 26 and 27 January 2012. Is
 22 that right?
 23 **A. That's correct, yes.**
 24 Q. When did you first become involved in Operation Shire?
 25 **A. On the afternoon of the 25th I received a call from**

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1 **DI Cousen, the senior investigating officer, outlined**
 2 **very briefly some circumstances that suggested he might**
 3 **need some armed support with his investigation.**
 4 **I arranged to meet him that afternoon.**
 5 Q. Your first action, as it were, was to attend a meeting
 6 with him?
 7 **A. Yes.**
 8 Q. And others, as we will come to discover.
 9 I think the meeting was in Nexus House; is that
 10 right?
 11 **A. In Tameside, that's correct, yes.**
 12 Q. Specifically the meeting was in the Robbery Unit?
 13 **A. Yes.**
 14 Q. So you went to him in his unit?
 15 **A. Yes.**
 16 Q. Was that normal, that you would go to the requesting
 17 unit to receive a briefing, conduct a risk assessment
 18 meeting?
 19 **A. The nature of the call that I took from the detective**
 20 **inspector suggested that it was worthwhile me going and**
 21 **discussing it face to face properly, as opposed to**
 22 **having a phone conversation. I have conducted risk**
 23 **assessments for firearms deployments over the phone but**
 24 **not with the Force Robbery Unit. My experience would be**
 25 **that it was always worthwhile to go and discuss it face**

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1 **to face.**
 2 Q. Why was it worthwhile to go and discuss it face to face?
 3 **A. The reason being because of the complexity or the threat**
 4 **that is offered by some of the nominals that the force**
 5 **robbery unit were tracking.**
 6 Q. So it would be important to -- "confront" is the wrong
 7 word, but sit across the table with the person who was
 8 making the application essentially to you?
 9 **A. Time allowing, I would always do that as a matter of**
 10 **good practice, yes.**
 11 Q. Can I understand what the nature of the meeting was. If
 12 you look in your bundle at your first witness statement,
 13 please, your witness statement of 19 October 2012.
 14 **A. Yes.**
 15 Q. In the third paragraph, you say:
 16 "At about 1400 hours on Wednesday, 25 January 2012
 17 I attended a firearms risk assessment meeting at
 18 Nexus House."
 19 You call it there "a firearms risk assessment
 20 meeting"; is that a term of art?
 21 **A. Yes. I have actually never heard it referred to as**
 22 **anything other than that.**
 23 Q. Is there a formal requirement for such a meeting, a risk
 24 assessment meeting?
 25 **A. No, it is a matter of professional judgment, based upon**

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1 **the first approach that might come into the tactical**
 2 **firearms commander.**
 3 Q. If you just look at your second witness statement,
 4 please, in the next tab, 17 October 2014, in the fourth
 5 paragraph you say:
 6 "On 25 January 2012 at Nexus House, Tameside I met
 7 with the officers investigating Operation Shire in order
 8 to discuss the risk and threat offered by the subjects.
 9 Such a meeting is required when considering whether any
 10 operation requires the deployment of armed police
 11 officers."
 12 That sentence there suggests that a meeting is
 13 required; is that overstating it there?
 14 **A. I think it -- a meeting is required in every instance.**
 15 **Whether that meeting is conducted over the telephone or**
 16 **whether that meeting is conducted face to face would**
 17 **depend on the circumstances of the approach.**
 18 Q. This is essentially a recognised term of art that you
 19 would expect to be common parlance amongst certainly the
 20 silver firearms commanders?
 21 **A. The term "risk assessment meeting"?**
 22 Q. Yes.
 23 **A. Yes, I would. Yes.**
 24 Q. No doubt you would say that it was good practice for
 25 a meeting, ie a physical meeting, to take place, if time

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1 allowed?
 2 **A. I would, yes.**
 3 Q. Was it common in your experience for such a meeting to
 4 be held?
 5 **A. Yes.**
 6 Q. I am using "meeting" in the sense of two people coming
 7 together face to face rather than by telephone?
 8 **A. It is common for that to take place, yes and certainly**
 9 **to add a little context for you, if the initial**
 10 **phone call suggested there was a significant degree of**
 11 **detail involved, then my view is that it would not be**
 12 **appropriate to conduct it over the phone then and**
 13 **I would always go face to face.**
 14 Q. You said that it is common, back in this time,
 15 January 2011 to January 2012, as far as you personally
 16 are concerned, was it common for you to have
 17 a face-to-face meeting --
 18 **A. Yes.**
 19 Q. -- and sit down with the man or woman that was asking
 20 you to make an application for a deployment?
 21 **A. Yes.**
 22 Q. What knowledge do you have, if any, about how other TFCs
 23 conducted themselves in relation to the necessity of
 24 such a meeting?
 25 **A. I don't have any knowledge of how others would do it.**

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1 **I think, as I say, it is probably a judgment call based**
 2 **upon the phone conversation with the initial response as**
 3 **to whether they follow it up with face to face or not.**
 4 **But -- how intent others are as I would be in going**
 5 **face to face, I couldn't answer.**
 6 Q. You cannot answer, okay.
 7 This was at 2.00 on a Wednesday, Wednesday the 25th.
 8 Did you go straight down there, effectively, to see --
 9 **A. Yes, as I recall, the initial phone call was just**
 10 **a couple of hours before that and we arranged to meet**
 11 **fairly quickly and that was just some of the logistics**
 12 **giving us time for a TAC adviser to be sourced and to**
 13 **get there as well.**
 14 Q. We know, winding forwards a little bit, that the
 15 briefing of the firearms officers was conducted at about
 16 5.00, just before 5.00 the following morning, Thursday
 17 the 26th. In that type of timeframe, meeting at 2.00 on
 18 the Wednesday, doing everything that was necessary,
 19 getting the authority from the ACC and briefing up the
 20 AFOs the next morning at 5.00, you wouldn't consider
 21 that a case of such urgency that it is not possible to
 22 hold a meeting?
 23 **A. No.**
 24 Q. Who called the meeting, as it were? Was it DI Cousen or
 25 was it you?

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1 **A. DI Cousen made the call to me as the duty TFC that day**
 2 **and I asked for a meeting to take place that afternoon.**
 3 Q. It was your call effectively?
 4 **A. Yes.**
 5 Q. Can we see who was present, please. Tab 4 of your
 6 bundle.
 7 If you can just confirm that in tab 4 is your TFC
 8 command log.
 9 **A. It is, yes.**
 10 Q. We are going to be looking at a few pages in this, but
 11 to start with 2319, which is the fifth page of the
 12 log --
 13 **A. Yes.**
 14 Q. -- can you see the entry at 25/1/12, "RA", does that
 15 mean risk assessment?
 16 **A. It does.**
 17 Q. Risk Assessment meet conducted at Nexus House, TFC,
 18 Superintendent Ellison, that is you?
 19 **A. Yes.**
 20 Q. The TAC adviser, that was J4, he has a pseudonym.
 21 **A. Yes.**
 22 Q. The SIO, DI Cousen, yes?
 23 **A. Yes.**
 24 Q. Somebody from the DSU, DS Johnston?
 25 **A. Yes.**

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1 Q. And observing Sergeant Cook, who was the staff officer,
 2 is that right, SO?
 3 **A. It is, yes.**
 4 Q. To ACC Sweeney?
 5 **A. Yes.**
 6 Q. Just going through some of those personnel, why was the
 7 TAC adviser present?
 8 **A. I would routinely have a TAC adviser present at**
 9 **a meeting like this where we were potentially**
 10 **considering advanced firearms tactics such as MASTS.**
 11 Q. Help us a little more, why was he necessary at this
 12 stage?
 13 **A. In terms of my own knowledge, is that the comparison?**
 14 Q. No, no, just generally. Why would you want a TAC
 15 adviser at this stage?
 16 **A. A tactical adviser is specifically professionally**
 17 **trained in all aspects of firearms deployment, including**
 18 **all the tactics and the logistics. They are also**
 19 **trained in terms of risk assessing firearms as well so**
 20 **although the ultimate decision would sit squarely with**
 21 **the TFC, they are also a very useful sounding board to**
 22 **have in a risk assessment meeting.**
 23 Q. Thank you.
 24 They bring almost subject matter expertise of
 25 firearms into the room?

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1 **A. Yes.**
 2 Q. DS Johnston, from the DSU, why was he present and
 3 necessary?
 4 **A. Well, it was already clear to me from the first phone**
 5 **call with DI Cousen that surveillance had been deployed**
 6 **without armed support that morning and indeed some of**
 7 **the feedback from the surveillance deployment was being**
 8 **brought into the risk assessment meeting around patterns**
 9 **of behaviour and what have you. So I wanted DI Johnston**
 10 **there to provide a perspective on what the team had seen**
 11 **that morning.**
 12 Q. Thank you.
 13 Lastly Sergeant Cook, the staff officer to
 14 Mr Sweeney, I think it is a he, isn't it?
 15 **A. It is a he, yes.**
 16 Q. Why was he there?
 17 **A. He was purely there for development as an observer and**
 18 **he did ask permission to be there, which I had no reason**
 19 **to object.**
 20 Q. Did he play no active part in the meeting?
 21 **A. No active part at all.**
 22 Q. For this kind of deployment, or proposed deployment, on
 23 what you had been told, by Mr Cousen, would you consider
 24 a briefing over the phone with the SIO to be
 25 inappropriate?

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1 **A. Yes. There was enough offered on the telephone with**
 2 **Rob Cousen to suggest there was a lot of detail around**
 3 **one particular nominal who was involved.**
 4 Q. Was that Mr Totton?
 5 **A. Mr Totton, yes.**
 6 **There was a suggestion of quite a wide ranging**
 7 **association, that, and I didn't think it was appropriate**
 8 **to discuss the wider details on the phone.**
 9 Q. Of course if you conduct a risk assessment meeting over
 10 the phone, you don't have access to any of the documents
 11 that the SIO may have with him or her, do you?
 12 **A. No. I mean of course I would have access to the force**
 13 **systems, but certainly as the TFC I would rely on the**
 14 **professionalism of the investigating team and the**
 15 **intelligence staff to provide me with a comprehensive**
 16 **briefing around any particular nominal.**
 17 Q. Yes.
 18 You received a briefing from DI Cousen as to the
 19 activities of members of an alleged OCG, between
 20 September 2011 and the day before you were being
 21 briefed, I think. The 24th, is that right?
 22 **A. Yes, that's right.**
 23 Q. Can we look, please, at pages 2319 and then 2321.
 24 You can see that this part of your log is headed
 25 "Intelligence/intelligence narrative".

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1 Then if you look down, underneath the date of
 2 25 January there are dates of 30 September, 1 October
 3 the previous year, 31 December, 13 January -- I think
 4 that should be 2012 -- 19 January 2012.
 5 **A. Yes, it should be.**
 6 Q. Et cetera, yes?
 7 **A. Yes.**
 8 Q. Then some gradings of the intelligence and then the
 9 substance of the intelligence?
 10 **A. Yes.**
 11 Q. Would you always use this part of your log in this way?
 12 Ie to record the crystallised intelligence that you were
 13 being passed?
 14 **A. Yes, I would. I certainly wouldn't use the log almost**
 15 **to record minutes, if you like, but to record the core**
 16 **elements of the intelligence that I am being offered to**
 17 **support my decision making, yes.**
 18 Q. When you say minutes, what you don't mean is writing
 19 down what is happening to you in the course of the day?
 20 **A. That is right, yes.**
 21 Q. You would not use it for that purpose?
 22 **A. Yes, that's correct.**
 23 Q. Not least because there is another part of the log which
 24 has that function?
 25 **A. Yes. Yes, absolutely. As I say it is the core element**

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1 **of the meeting rather than a verbatim minuted format if**
 2 **you like.**
 3 Q. Exactly, and if we look at 2361 --
 4 **A. Yes.**
 5 Q. -- although you have used it as a continuation sheet,
 6 I think, of what you couldn't fit into the previous two
 7 pages, from 26/1/12 onwards have you then used it as
 8 a more conventional record of what happened and what you
 9 decided to do at various points of the 26th and then the
 10 27th?
 11 **A. Yes. Yes, absolutely.**
 12 Q. Okay. Going back then to 2319, you have used this to
 13 record the intelligence that you were provided with?
 14 **A. Yes.**
 15 Q. Yes.
 16 You have dated each piece of intelligence that you
 17 have been provided with; is that right?
 18 **A. Yes.**
 19 Q. Would you always do it that way?
 20 **A. Yes, and ask the question of the grading of the**
 21 **intelligence through the 5x5x5 system, just to see how**
 22 **meaningful it was.**
 23 Q. I am going to ask you about the use of the grading
 24 system in a moment. But you have set it out
 25 sequentially and in chronological order. Would you

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1 always do it that way, to see the way that the
 2 intelligence has developed?
 3 **A. Yes, I have and actually, through chairing the risk**
 4 **assessment meeting, I am quite particular about slowing**
 5 **the SIO down and talking me through in chronological**
 6 **order. It makes more sense to me to do it that way.**
 7 Q. Yes.
 8 You can see the second column in, the "Intel
 9 grading".
 10 Did you understand that the purpose of that column
 11 was for you to make a record of the NIM 5x5 grading of
 12 the intelligence with which you were provided?
 13 **A. Yes.**
 14 Q. We can see that, although in our version it has been
 15 redacted underneath 30/9/11, that has a grading under
 16 it, and under 1/10/11, that has been redacted too?
 17 **A. Yes.**
 18 Q. For 31 December 2011, 13 January 2012 and
 19 19 January 2012, there is a grading there and over the
 20 page on to 2321, there are two gradings there as well?
 21 **A. Yes.**
 22 Q. We can see that you have therefore assiduously filled in
 23 this column with the grading?
 24 **A. Yes.**
 25 Q. Why is that important?

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1 **A. It is important for me as the ultimate decision maker as**
 2 **to whether a firearms deployment is required because it**
 3 **gives -- the strength of the grading gives the**
 4 **intelligence more credibility.**
 5 **I can expand on that if you like?**
 6 Q. Yes, please.
 7 **A. For example an E4 grading would come from an anonymous**
 8 **untested source, which only carries a limited amount of**
 9 **weight. Something that comes in from a B2 grading is**
 10 **coming from a trusted and reliable source, so it clearly**
 11 **has a lot more credibility.**
 12 Q. In general terms, why is the reliability -- this may
 13 sound a very obvious question -- of the intelligence or
 14 the assessed reliability of the intelligence with which
 15 you are provided important?
 16 **A. I think it is vital to me as a TFC in terms of making**
 17 **a decision to put armed officers on to a street, whether**
 18 **it is advanced tactic or a more basic firearms tactic is**
 19 **a big decision to make. I have to make sure that that**
 20 **tactic that we are going to use is proportionate to the**
 21 **degree of threat that we are facing. To decide if the**
 22 **threat is going to be proportionate or not I have to**
 23 **understand the credibility of the intelligence that**
 24 **supports the threat.**
 25 Q. A couple of other things, would you agree that it is

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1 important, if you are going to use the intelligence, to
 2 make your application to the ACC?
 3 **A. Yes. Yes, I am absolutely.**
 4 Q. A third way in which it might also be relevant is some
 5 of this intelligence may end up being "briefed down" to
 6 the AFOs?
 7 **A. Yes, yes.**
 8 Q. Therefore you would want to be able to ensure that they
 9 were passed accurately-graded assessed intelligence?
 10 **A. Yes, as far as possible, yes.**
 11 Q. Do you largely rely on the investigating team to ensure
 12 that the information with which you are provided, the
 13 intelligence that you are provided with, is accurate, as
 14 far as is possible, ie accurately stated, and has been
 15 assessed?
 16 **A. Yes, I have to rely on the professionalism of the**
 17 **investigating team and their intel support to provide me**
 18 **with accurate information, yes.**
 19 Q. Again, it may sound obvious, why do you have to largely
 20 rely on them?
 21 **A. It is a matter of practicality. I could research each**
 22 **nominal off an extensive list myself, that would clearly**
 23 **take a long time, and we have professional people who**
 24 **are working in this case in a specialist department and**
 25 **it is a reasonable assumption that they are providing me**

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<p>1 with intelligence reports which are accurate.</p> <p>2 Q. It is partly because the investigating team have more</p> <p>3 time and longer access to better intelligence sources</p> <p>4 than do you?</p> <p>5 A. Yes, invariably the investigating team have been working</p> <p>6 on or around a nominal or a subject for quite</p> <p>7 a protracted period of time and that information is all</p> <p>8 to hand.</p> <p>9 Q. Whereas this comes to you completely fresh, almost out</p> <p>10 of the blue?</p> <p>11 A. Yes.</p> <p>12 Q. Can I just take you to a part of the ACPO manual of</p> <p>13 guidance that was then current, at F/677, please. Can</p> <p>14 you see paragraph 6.11, please.</p> <p>15 A. 677.</p> <p>16 Sorry, which paragraph?</p> <p>17 Q. 6.11?</p> <p>18 A. Yes.</p> <p>19 Q. "The TFC must ensure that as far as time permits,</p> <p>20 information and intelligence is appropriately assessed,</p> <p>21 graded and, where possible, verified. Information and</p> <p>22 intelligence should be passed to officers as necessary</p> <p>23 for the roles they are performing."</p> <p>24 The guidance is placing a responsibility on the TFC</p> <p>25 as far as time permits to ensure information and</p> <p style="text-align: center;">Page 101</p>	<p>1 described, that he is clear about what he is saying and</p> <p>2 that he provides you with the grading of it?</p> <p>3 A. Absolutely, yes.</p> <p>4 Q. The second part of your answer is that if you had</p> <p>5 concerns about it, then you had the facility to go off</p> <p>6 and either conduct checks yourself or require checks to</p> <p>7 be conducted?</p> <p>8 A. Yes.</p> <p>9 Q. Had you ever done that? I know in this case you ask for</p> <p>10 some more information and DC Clark is brought into the</p> <p>11 room. Aside from that, before then had you ever had</p> <p>12 cause to think this needs to be looked into more?</p> <p>13 A. Yes -- there have been occasions on previous risk</p> <p>14 assessment meetings when I have done that and time has</p> <p>15 allowed further development to be put in place around</p> <p>16 a nominal or more, so yes I have pushed back on that in</p> <p>17 the past.</p> <p>18 Q. "Pushed back" is quite a good word. The result of the</p> <p>19 push back, was that to get the applicant, the SIO or</p> <p>20 whoever it was, to do the further work, or would you</p> <p>21 cause it to be done by getting somebody within your</p> <p>22 team, your operational command, to look at the PNC, go</p> <p>23 off and look at OPUS, or whatever it is?</p> <p>24 A. No, the push back has been back towards the</p> <p>25 investigating team.</p> <p style="text-align: center;">Page 103</p>
<p>1 intelligence is "appropriately assessed, graded and,</p> <p>2 where possible, verified".</p> <p>3 Did you understand that that was part of your job?</p> <p>4 A. Yes, ultimately, as the firearms commander. As I say,</p> <p>5 for reasons of -- for practical reasons you have to be</p> <p>6 able to rely on the professionalism of those presenting</p> <p>7 the data to you from a specialist department.</p> <p>8 Q. That can be put away, thank you.</p> <p>9 In order to discharge that responsibility, and</p> <p>10 allowing for the practicalities that you mention, how</p> <p>11 would you discharge that responsibility?</p> <p>12 A. Well, it would sit with -- in this case the detective</p> <p>13 inspector was in the risk assessment meeting to present</p> <p>14 me with the detail and to be available for me to put</p> <p>15 back any challenges or ask any questions or ask for any</p> <p>16 clarification. If I was not satisfied with the</p> <p>17 responses then I may probe further or indeed I could</p> <p>18 access the four systems myself, but the reality is that</p> <p>19 they are specialist members of staff who are trained as</p> <p>20 professionals to be able to access it themselves.</p> <p>21 Q. Is what you are saying in the first part of that answer,</p> <p>22 really, that you discharge your responsibility by</p> <p>23 ensuring that the person providing you with the</p> <p>24 intelligence, in this case Mr Cousen, provides it to you</p> <p>25 in the logical sequential format that you have</p> <p style="text-align: center;">Page 102</p>	<p>1 Q. So the long and the short of it is that you really do</p> <p>2 rely on them, both to provide you with accurate assessed</p> <p>3 intelligence and, if they don't, to then service your</p> <p>4 demands for greater particularity or research?</p> <p>5 A. Yes, that is a fair summary, yes.</p> <p>6 Q. Can we look, please, if you have still have it open --</p> <p>7 good, you have, page 2319 in tab 4, still on this risk</p> <p>8 assessment meeting. Can you see the first subject is</p> <p>9 described as "Subject David Totton", then his date of</p> <p>10 birth:</p> <p>11 "Subjects of Operation Shire, Robbery Unit target.</p> <p>12 Victor India ..."</p> <p>13 And then a weapons marking, yes?</p> <p>14 A. Yes.</p> <p>15 Q. Then a little further down under 1 October 2011, three,</p> <p>16 four lines in, it says:</p> <p>17 "Robert Rimmer ..."</p> <p>18 Then there is a violent and a weapons marker again?</p> <p>19 A. Yes.</p> <p>20 Q. You seem to write down the name of a subject there, in</p> <p>21 each case, and then immediately afterwards write their</p> <p>22 warning markers.</p> <p>23 A. Yes.</p> <p>24 Q. Is that a conventional approach?</p> <p>25 A. It is for me, yes. The markers of course come off the</p> <p style="text-align: center;">Page 104</p>

<p>1 police national computer. They are usually pertinent, 2 they should always be pertinent to either previous 3 offending or some significant intelligence relating to 4 that individual. 5 Q. When you say they should be pertinent to either previous 6 offending, you mean convictions? 7 A. Yes. 8 Q. Or significant intelligence, what do you mean by 9 significant intelligence? 10 A. Where someone perhaps has been arrested or eliminated in 11 terms of the investigation or NFAed as part of the court 12 proceedings, a PNC marker can still be applied. 13 Q. You say, if we look in your second witness statement, 14 please, it is the same bundle, tab 2. 15 A. Yes. 16 Q. In the fourth paragraph, so the last paragraph on the 17 page, about 6 or 7 lines in, you say, "As the TFC ..." 18 A. Yes. 19 Q. I will just wait for chairman to get there. 20 THE CHAIRMAN: Yes, what was the page again? 21 MR BEER: 17 October, witness statement -- 22 THE CHAIRMAN: I have that, it is the particular page of 23 that. 24 MR BEER: The first page. 25 THE CHAIRMAN: The first page. Thank you.</p> <p style="text-align: center;">Page 105</p>	<p>1 a murder? 2 A. Yes, absolutely, yes. 3 Q. And it could be conviction down to intelligence? 4 A. Yes. 5 Q. Where you say here, "Any warning markers are routinely 6 explored in detail to establish potential risk and 7 threat", you are meaning you explore them in detail -- 8 A. Yes. 9 Q. -- to establish potential threat and risk? 10 A. Yes, and I expect the investigation team to be able to 11 give me the context behind those marks. If they cannot, 12 then they will be retasked to provide that information. 13 Q. Is that because, putting it frankly, just writing 14 somebody has VI next to their name doesn't tell you 15 anything at all? 16 A. It gives you a -- well, it gives you a suggestion that 17 someone might have some sort of propensity to violence 18 or has demonstrated a violent streak in the past, but it 19 really lacks context without asking the right question. 20 Q. To specify in more detail my question, it doesn't give 21 you enough information to act on it? 22 A. No, it is what it is, it is a warning marker, so the 23 warning -- it is right to ask the question. 24 Q. Putting it another way, just because there is a weapons 25 marker, you don't assume that in the operation that you</p> <p style="text-align: center;">Page 107</p>
<p>1 MR BEER: "As the TFC [middle of the last paragraph] I rely 2 on the professionalism of the investigation team to 3 ensure that the intelligence packs are current and 4 complete and any warning markers against individual 5 subjects on the PNC are routinely explored in detail to 6 establish the potential risk and threat that any 7 individual may offer." 8 The sentence in the middle there seems to change 9 between reliance on the professionalism of the 10 investigation and then talking about what happens to 11 warning markers. Are you saying that you rely on their 12 professionalism to have checked warning markers, or that 13 when you are presented with warning markers you explore 14 them in detail? 15 A. Yes and yes, which is not helpful I know. But 16 I routinely ask for the context behind a warning marker. 17 A little context for you, a Foxtrot India marker for 18 example might relate to someone who had an offence 19 involving an air weapon as a teenager or it might 20 involve someone who has actually been using fully 21 automatic weapons committing crimes, so there is a lot 22 of context behind the marker that needs exploring 23 properly. 24 Q. The same for violent warning markers too, it can be 25 a slap delivered in the street or a section 18 or</p> <p style="text-align: center;">Page 106</p>	<p>1 are currently engaged in, that subject may possess 2 a weapon or have immediate access to a weapon? 3 A. No. 4 Q. You will wish to know what it was for, how recent it 5 was, how serious the incident was? 6 A. I would and I would consider the warning marker and the 7 context against other intelligence and the offending 8 history. 9 Q. The same for a violent marker? 10 A. Indeed, yes. 11 THE CHAIRMAN: Can I just make a note of that. 12 You would consider the warning or violence marker 13 against other intelligence and the individual's 14 offending history? 15 A. Yes. 16 MR BEER: Just picking up on that latter point, that sounds 17 like a cross-check, the offending history, that you are 18 looking for information that would either confirm or 19 deny the warning marker. Would that be a fair way of 20 putting it? 21 A. It would. A warning marker can be applied from one very 22 isolated incident, whereas the offending history and the 23 intelligence is more likely to give you a pattern of 24 behaviour and a trait about an individual than the 25 stand-alone marker.</p> <p style="text-align: center;">Page 108</p>

1 Q. A more rounded picture?

2 **A. Yes.**

3 Q. Sir, I have been going for an hour and a quarter now.

4 THE CHAIRMAN: Really?

5 MR BEER: No, it is 45, sorry.

6 THE CHAIRMAN: Time is rushing by if that --

7 MR BEER: It is only if you asking the questions it feels

8 like longer, maybe not actually.

9 THE CHAIRMAN: Would you like a break?

10 MR BEER: No, no, I am fine, thank you very much. I thought

11 we had started early, that was why.

12 On page 2319, at tab 4, do you have that, we are

13 still on your note, can you see that, against

14 Robert Rimmer, so the entry for 1 October 2011, we have

15 violent and weapons, and then it says:

16 "Has pre con from 2006 for attempted murder using

17 a knife in a city nightclub."

18 Can you see that?

19 **A. I can, yes.**

20 Q. Is that what Mr Cousen told you?

21 **A. Yes.**

22 Q. You would trust him in particular presumably when he is

23 talk being a previous conviction?

24 **A. Yes.**

25 Q. If we look, please, and this means having a second

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1 bundle out, at certainly for the chairman, and I think

2 we have extracted it for you. Can you see the

3 PowerPoint presentation?

4 **A. Yes.**

5 Q. Thank you.

6 For you, sir, it is G1/327.

7 THE CHAIRMAN: Yes, I am there.

8 MR BEER: If we look at 315, we can see this is the

9 PowerPoint presentation that was delivered the next

10 morning.

11 **A. Yes.**

12 Q. I just want to look, please, at 327, where we look at

13 the threat assessment as part of a PowerPoint for

14 Robert Rimmer.

15 Can you see that?

16 **A. I can, yes.**

17 Q. I am going to explore later the process by which this is

18 drawn up. But you can see there, it says, under

19 capability:

20 "Subject has served five and a half years for

21 a section 18 assault whereby he stabbed a girlfriend's

22 ex-partner in the abdomen."

23 Which was accurate, we know that is accurate from

24 other information that we have.

25 You can see that what Mr Cousen told you was

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1 an attempted murder, this is the same incident.

2 **A. Right.**

3 Q. Mr Cousen told you was an attempted murder has been

4 correctly written up in the threat assessment as

5 a section 18 assault.

6 How -- I mean it is obviously a good thing that that

7 has happened, an overstated inaccurate picture has been

8 corrected for the firearms officers when they are

9 briefed. How has that accuracy been introduced after

10 DI Cousen?

11 **A. That would have been introduced by one of the Tactical**

12 **Firearms Unit staff who has been putting the PowerPoint**

13 **presentation together. Clearly they were not in the**

14 **risk assessment meeting so they will have accessed OPUS,**

15 **the force system, directly to get the form of words for**

16 **the PowerPoint presentation.**

17 Q. Just tell me that again, the firearms staff or firearms

18 briefing staff as you called them, put that together?

19 **A. Yes, there will be an officer designated to the role at**

20 **the Tactical Firearms Unit who will put the briefing**

21 **pack together.**

22 Q. Okay, we are going to explore that in a bit more detail

23 subsequently.

24 You wouldn't have had any direct involvement in that

25 correction being made?

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1 **A. No.**

2 Q. Thank you.

3 Can we go back, then, to your log, your bundle,

4 tab 4, page 2319.

5 Can we go through the entries, just to make sure

6 that we can understand what they say and what they mean.

7 30 September, I have already read most of it.

8 But carrying on after the warnings:

9 "Totton recognised by serious organised crime group

10 Robbery Unit as significant in Salford based OCG. Intel

11 and offending history indicates extremely violent."

12 Is that the word, "violent", under --

13 **A. Sorry, I am struggling to place these words --**

14 **whereabouts are the page?**

15 Q. If you look at page 2319.

16 **A. Yes.**

17 Q. Under 30 September --

18 **A. Yes, sorry I am with you, yes.**

19 Q. "Totton recognised by serious organised crime group

20 Robbery Unit as significant in Salford based OCG. Intel

21 and offending history indicates extremely ..."

22 Is that "violent"?

23 **A. Yes, it will be, yes.**

24 Q. "... Op Shire focused on [some redaction] intelligence,

25 that team of Totton, Aaron Corkovic and Jamie Corkovic

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1 planning to commit robberies using vehicles being
 2 sourced."
 3 Is that correct?
 4 **A. That's correct.**
 5 Q. You were being told about some intelligence dated back
 6 in September 2011, with an OCG consisting of
 7 David Totton, Aaron Corkovic and Jamie Corkovic planning
 8 to commit robberies --
 9 **A. Yes.**
 10 Q. -- using vehicles that were sourced? On 1 October:
 11 "Intelligence that further [blank] links Totton to
 12 Robert Rimmer and the Corkovics. As a result MASTS run
 13 on Corkovics using stolen vehicles laid up in Prestwich
 14 and ..."
 15 Is that Whitefield?
 16 **A. Whitefield, yes.**
 17 Q. "Robert ..."
 18 I think you called him Robin actually?
 19 **A. Yes, Robin.**
 20 Q. "... Rimmer [then you put the two warnings down] hs a
 21 pre con from 2006 for attempted murder using a knife in
 22 a city nightclub. He is associated to Totton and is
 23 known to be using a black Renault Megane ..."
 24 You have given the registration number.
 25 **A. Yes.**

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1 Q. Again that in both cases has been graded, albeit it is
 2 redacted in our version.
 3 **A. Yes.**
 4 Q. 31 December, A1.1:
 5 "Totton leaves United Kingdom for trip to Thailand.
 6 Returning on 13 January 2012 when the dedicated
 7 surveillance unit follow him to a flat in Charlestown,
 8 Blackley, Rimmer's car is at that location when he
 9 arrived."
 10 Then in the new year:
 11 "Lack of further intel at that time on Totton and
 12 Rimmer. Put Operation Shire focus back on to the
 13 Corkovics."
 14 19 January 2012, again same grading:
 15 "16 Salford OCG."
 16 Is that 16?
 17 **A. 16, yes.**
 18 Q. "Salford OCG are surveilled going ..."
 19 **A. "Go carting".**
 20 Q. "Go carting together", thank you:
 21 "... during which Corkovic begins severe
 22 anti-surveillance activities, that causes DSU to
 23 withdraw something suggests two vehicles being moved and
 24 planning underway for robberies. Covert tactics then
 25 established two stolen motor vehicles on cloned VRM

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1 plates ..."
 2 You give the details, that is the BMW and the Audi
 3 that we know about:
 4 "... are being kept on Hazelhurst Road in area for
 5 offence by the Corkovics. DSU deploy on
 6 24 January 2012. DSU activation at 5.15 in the morning
 7 indicates that ..."
 8 Is that "activation" or "observation"?
 9 **A. Activation, yes.**
 10 Q. "... indicates both vehicles mobile."
 11 Is that from a VTD?
 12 **A. Yes, technical equipment.**
 13 Q. Yes. Both vehicles mobile, Robbery Unit alerted, note
 14 vehicles moving south and -- what is the next word?
 15 **A. Liaise.**
 16 Q. Thank you:
 17 "... Operation Sandpiper, Staffs police who assist
 18 with surveillance while GMP mobilise a DSU team."
 19 Then maybe if you read the next one, please.
 20 **A. Yes:**
 21 **"Both vehicles, BMW and Audi, make under**
 22 **surveillance to a G4S depot at Bury Hill Road,**
 23 **Stoke-on-Trent, execute a recce of the depot and**
 24 **training estate, then observe G4S CVIT van leaving.**
 25 **Following recce, both vehicles make straight back to**

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1 **Worsley area of Manchester, DSU confirm Totton to be**
 2 **sole occupant of the Audi (driver), BMW has two persons**
 3 **on board not yet identified. On arrival Totton alights**
 4 **Audi wearing a hi-viz jacket and carrying a heavy object**
 5 **in pocket, believed to be a radio. Surveillance camera**
 6 **sees BMW make off in convoy with a black Renault Megane,**
 7 **no VRM but similar to that owned by Rimmer. Both cars**
 8 **at 12.30 hours are parked and secure on Sandringham**
 9 **Road, Worsley still carrying cloned VRM plates."**
 10 Q. Just stopping there, if you would, you say in one of
 11 your statements that in this particular meeting you had
 12 occasion to request some additional information?
 13 **A. Yes.**
 14 Q. You say at the foot of page 1 of your second statement:
 15 "In this particular meeting, in order to be
 16 satisfied that the issue of the individuals being
 17 "Otherwise so dangerous", I requested more background
 18 and intelligence and the SIO introduced an additional
 19 member of his team to the meeting to provide specific
 20 detail. Is that right?
 21 **A. That's right, yes.**
 22 Q. Why in this meeting did you need to be satisfied in
 23 relation to the otherwise so dangerous category?
 24 **A. Well, as we had established, I had come in cold to this**
 25 **OCG and this investigation at about 1400 hours that day.**

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1 Q. Yes.

2 **A. It was quite clear-cut from the conversation that there**

3 **was quite an extensive association map developing**

4 **through the conversation around David Totton.**

5 **Now, a lot of the intelligence surrounding Totton**

6 **did suggest that he either had access to firearms or**

7 **possession of firearms, but there was nothing specific**

8 **in relation to the wider association map. I was asking**

9 **questions, trying to establish and get clarity in my**

10 **mind, about who was associated with who and what degree**

11 **of threat was actually owned by other persons connected**

12 **to Totton but not necessarily directly connected to**

13 **firearms.**

14 Q. I see, so putting it shortly, in the information that we

15 have read so far, there wasn't anything that

16 particularly satisfied you as a firearms risk, re the

17 associates?

18 **A. No. That is fair, yes.**

19 Q. So you asked for some more information?

20 **A. Yes.**

21 Q. Can you remember how you put it? What you were looking

22 for? I appreciate it is five years ago.

23 **A. No, it is five years ago I don't remember the exact**

24 **words I used I am afraid but they were words to suggest**

25 **that whilst I was satisfied with the threat offered by**

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1 **David Totton in relation to firearms, given that there**

2 **were two vehicles travelling separately towards Stoke**

3 **and a recce had been carried out which suggested**

4 **a potential threat to a cash in transit vehicle,**

5 **I needed to know more about the wider picture and**

6 **individuals who might be in that other car. There was**

7 **a lot of unknowns being offered at this point -- we have**

8 **talked about Corkovics and Rimmers, but actually we have**

9 **got Totton driving the Audi, we don't know who in the**

10 **other cars. So the other names are almost academic at**

11 **this stage and I wanted more detail around the**

12 **association map to try and establish exactly what threat**

13 **unknown persons in the other vehicle might offer.**

14 Q. Is this a fair way of putting it, that although in risk

15 assessing you must focus on the threat offered by the

16 person who offers the highest threat, yes?

17 **A. Yes.**

18 Q. That doesn't absolve you from the responsibility,

19 nonetheless, to individually risk assess the other

20 potential subjects?

21 **A. Yes, if indeed we can identify other subjects. That was**

22 **my point, they were unknowns in many respects. We had**

23 **a growing association map but it was unknown as to who**

24 **was in the other vehicle.**

25 Q. To follow my question through, you would want, as far as

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1 you could, to identify them and to see what risk if any

2 they posed?

3 **A. Yes, absolutely.**

4 Q. Thank you.

5 Is it in relation to those issues that DC Clark was

6 brought into the room?

7 **A. Yes, it is, yes.**

8 Q. What you had done was this a push back effectively, you

9 were pushing back against what Mr Cousen was telling

10 you?

11 **A. Yes, it was a push back. It was almost actually a foot**

12 **on the ball moment to say, "Listen, let's just hold our**

13 **horses here because there are a lot of unknowns, I want**

14 **to be able to assess the threat accurately or as far as**

15 **possible accurately with the unknowns", and I was**

16 **starting to ask questions about what the unknowns meant**

17 **and it was DC Dave Clark was offered as a solution.**

18 Q. A substitute?

19 **A. To close some of those knowledge gaps, yes.**

20 Q. Mr Clark comes in, had he been prepared for this as far

21 as you were aware or was this happening in an improvised

22 way?

23 **A. To be fair to Dave Clark he had not been prepared for it**

24 **in terms of coming in with formal presentation.**

25 **However, the way his career was outlined to me and his**

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1 **involvement with investigating that OCG, I took the view**

2 **that he was well placed from a professional knowledge**

3 **point of view to answer some questions in a broad sense.**

4 Q. That was because he had long and detailed experience in

5 the Salford OCG scene; is that right?

6 **A. Yes, that is how it was outlined, yes.**

7 Q. If we look at the foot of page 2321, your log, is the

8 information that is set out there, from Dave Clark,

9 DC Clark, underneath the big black line?

10 **A. Points 1 to 4.**

11 Q. 1 to 4?

12 **A. Yes.**

13 Q. He essentially gave you, on this half of the page, four

14 additional pieces of intelligence. Is that right?

15 **A. He did, yes.**

16 Q. Can we go through each of them. If you start, carry on

17 reading, please, "History supporting ..."

18 **A. "History supporting threat of potentially lethal force**

19 **by Totton and associates."**

20 **Point 1:**

21 **"SOCG intel of Totton and [blank] being chased into**

22 **a property in Lower Broughton in 1998 and found close to**

23 **a hidden pump action shotgun, not prosecuted despite**

24 **neighbours housing males at the address."**

25 Q. That was about Totton, not about the others. Is that

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1 fair?
 2 **A. That is fair.**
 3 Q. The second of them, please?
 4 **A. Point 2:**
 5 **"Operation Ascot 2005, investigated robberies of**
 6 **banks in the Culcheth and Blackpool areas, Totton**
 7 **believed [the reference says 'according to SOCG'] to be**
 8 **involved in planning and recce of both premise without**
 9 **actually committing the offence. Two associates**
 10 **received 12-year sentences, Totton not prosecuted ..."**
 11 **Sorry:**
 12 **"... and firearms used."**
 13 Q. Firearms used, quite. That was again about Totton; is
 14 that right?
 15 **A. Yes.**
 16 Q. Then the third, Operation Botany in 2002, please.
 17 **A. "Operation Botany 2002, Totton implicated in the kidnap**
 18 **of a male with a firearms but not prosecuted."**
 19 Q. Again, self-evidently about Mr Totton and then
 20 Operation Adequate in 2010?
 21 **A. Yes:**
 22 **"Totton observed picking up a car with another male**
 23 **and observing staff leaving bank premise, SOCG intel**
 24 **suggests they were planning a kidnap."**
 25 **The four pieces of intelligence in fact offered were**

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1 **all in fact back against Mr Totton?**
 2 **A. Yes, they were, yes.**
 3 Q. Not in relation to his associates?
 4 **A. No, I recall the conversation with DC Clark did talk**
 5 **about associates, including the Corkovics and Rimmer and**
 6 **I recall very clearly in my mind at this point coming to**
 7 **the opinion that this risk assessment meeting was about**
 8 **David Totton and potentially three from any one of five**
 9 **or six other males.**
 10 Q. You were talking about it is about DT and then perm 3 of
 11 6?
 12 **A. Yes, potentially, yes.**
 13 Q. I think the note continues though, if you carry on
 14 reading, please?
 15 **A. Yes:**
 16 **"SOCG Robbery Unit confirmed that Totton has a wide**
 17 **range of known associates in Salford area/OCGs but**
 18 **offending history indicates high propensity to**
 19 **violence."**
 20 **Foxtrot India, Victor India, Whisky Echo markings,**
 21 **section 47 and section 18 convictions, possession of CS**
 22 **gas in 2010 and a machete attack on another male in**
 23 **2001.**
 24 Q. Then you continue on page 30, which is our 2361.
 25 **A. Yes.**

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1 Q. At 2361 where you say, "Continued from page 6 ..."
 2 **A. Yes, it's continued from page 6. There is no further**
 3 **detail coming from the meeting with Dave Clark and then**
 4 **I have then gone into liaison with Operation Sandpiper**
 5 **in Staffordshire.**
 6 Q. Which is something else?
 7 **A. Yes.**
 8 Q. That is where the log proper picks up there, like
 9 a sequence of events or what you did throughout the day?
 10 **A. Yes, absolutely.**
 11 Q. Is it fair to say that you didn't get any intelligence
 12 there in fact about other members of the alleged OCG who
 13 were associated with Mr Totton from Mr Clark?
 14 **A. Other names were offered which then featured in the**
 15 **briefing PowerPoint that you have alluded to earlier,**
 16 **but there was no specific intel other than associations.**
 17 Q. On this note Mr Grainger is not mentioned at all, is he?
 18 **A. He is not on this note, no.**
 19 Q. Was Mr Grainger mentioned?
 20 **A. There was mention of an offence involving**
 21 **Stuart Grainger and Anthony Grainger, but it was**
 22 **an offence that Stuart Grainger was convicted of.**
 23 Q. What was that?
 24 **A. It was an offence involving -- it was a robbery and**
 25 **there was a MAC-10 fully automatic weapon involved and**

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1 **also the discharge of shotgun pellets towards officers.**
 2 Q. The same incident?
 3 **A. Yes.**
 4 Q. You haven't made a note of that here, any reason?
 5 **A. I can't offer a reason now. I don't recall why I would**
 6 **have made that decision at the time.**
 7 Q. This was from DC Clark, was it?
 8 **A. Yes.**
 9 Q. What did he tell you about this?
 10 **A. In relation to the Stuart Grainger and Anthony Grainger?**
 11 Q. Yes.
 12 **A. Precisely what I have just said, in terms of he was**
 13 **connected to an offence involving a shotgun.**
 14 Q. Who was, Anthony Grainger?
 15 **A. Yes.**
 16 Q. He was connected to the offence? What does "connected
 17 to" mean?
 18 **A. It was believed that -- well, there was a Stuart and**
 19 **Anthony Grainger mentioned. However, as I probed**
 20 **further it became clear that Stuart Grainger was the one**
 21 **convicted of that offence, not Anthony Grainger, and**
 22 **that was the context I was looking for. There was no**
 23 **further detail available about Anthony's precise**
 24 **involvement.**
 25 Q. Did he say whether Anthony Grainger had been charged

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1 with that offence?
 2 **A. I don't recall that conversation, no. What I do recall**
 3 **was that Stuart Grainger was convicted, whether Anthony**
 4 **was charged or not I don't know.**
 5 Q. Is that what he said?
 6 **A. Yes.**
 7 Q. Can you remember where this robbery was?
 8 **A. No, I don't.**
 9 Q. If I said Bolton in 2000; does that ring a bell?
 10 **A. It doesn't I am afraid, no. I think at this point the**
 11 **unknowns I am talking about and Anthony Grainger being**
 12 **one of a number of names who may or may not have been in**
 13 **a vehicle, but it was clear that Stuart was the**
 14 **individual who had been convicted of that offence.**
 15 Q. You had not been given any intelligence that implicated
 16 Anthony Grainger?
 17 **A. No, this was -- I was clear in my mind this was squarely**
 18 **about David Totton and three from five or six who were**
 19 **all unknown at that point but there was a large**
 20 **association map and I think it was a meeting there -- if**
 21 **we had kept talking the association map would have kept**
 22 **growing, he was literally that well connected and well**
 23 **established in the Salford and Manchester area.**
 24 Q. Was there a physical map there?
 25 **A. No.**

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1 Q. An Anacapa chart or something like that?
 2 **A. No, there wasn't.**
 3 Q. Can I turn then to what happened next, did you apply for
 4 authority from Mr Shewan?
 5 **A. Yes. Having said that, what would have happened**
 6 **immediately next would have been a discussion about the**
 7 **appropriate tactic for deployment, which would have**
 8 **taken place with the tactical adviser in the room at the**
 9 **time.**
 10 Q. Is that because before you went off to Mr Shewan you
 11 would need to be able to present him with a developed
 12 case?
 13 **A. A plan, yes.**
 14 Q. As to what the tactic was to be?
 15 **A. Yes, with the rationale for it.**
 16 Q. I just wanted to establish when you went off to
 17 Mr Shewan and then work out what had happened in the
 18 interim, if I may.
 19 If we look in tab 3 of this bundle --
 20 **A. Yes.**
 21 Q. -- you will see at the second page in, 2273, Mr Shewan's
 22 notes, in his log, yes?
 23 **A. Yes.**
 24 Q. Then if you look at 2275, can you see an entry at 16.45,
 25 25/1:

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1 "Discussed Operation Shire with tactical firearms
 2 commander, Superintendent Ellison."
 3 **A. Yes.**
 4 Q. He has a note of you speaking to him at 4.45?
 5 **A. Yes.**
 6 Q. Does that sound about right?
 7 **A. The initial call to ACC Shewan was at that time.**
 8 **I recall that there was a second call. He asked the**
 9 **question initially whether it was urgent. It was not**
 10 **urgent but we needed a conversation fairly soon was my**
 11 **response, so there was a second call after 16.45.**
 12 Q. I see.
 13 Were you taken up with the SIO, with DC Clark, the
 14 TAC adviser, and Mr Johnston, between 2.00 and 4.45?
 15 **A. For the bulk of it, yes, yes. I would suggest by the**
 16 **time I was clear in my mind that the criteria was met**
 17 **for an armed deployment, then DS Johnston, DI Cousen and**
 18 **DC Clark would not necessarily have been part of the**
 19 **conversation. I would have been talking to the TAC**
 20 **adviser then about the appropriate tactics and what the**
 21 **operational plan would have looked like.**
 22 Q. In terms of applying your mind, using your brain, to
 23 this operation and what you were going to do, before you
 24 went off to Mr Shewan, you spent about two hours and 45
 25 minutes receiving information, thinking about it and

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1 developing a tactical plan?
 2 **A. Yes.**
 3 Q. Would that be about the normal length of time or is that
 4 on the long side or --
 5 **A. No, that is quite protracted. I do tend to push back**
 6 **where appropriate but even by my standards, two hours 45**
 7 **is quite protracted.**
 8 Q. Two hours 45 minutes, yes?
 9 You said there would come a time really when
 10 Mr Johnston, Mr Cousen and Mr Clark's involvement would
 11 recede in importance and you would sit down with the TAC
 12 adviser.
 13 **A. Yes.**
 14 Q. Tell us why that would be the case, why you would want
 15 to have effectively some quiet time with the TAC
 16 adviser?
 17 **A. Simply to have a conversation from a firearms command**
 18 **point of view about the circumstances that were put**
 19 **before us in terms of the G4S site at Stoke-on-Trent,**
 20 **what we thought we were facing in terms of the likely**
 21 **target, the victim, the potential victim, the location,**
 22 **the offender and which would be the most proportionate**
 23 **tactic to put in play.**
 24 Q. Going back to your log then, can we see which bits were
 25 completed before you went off to Mr Shewan then?

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1 2323 --
 2 **A. Yes.**
 3 Q. -- which I think is page 7 on the internal pagination of
 4 the log. This I think is quite an important part of the
 5 log, is that right, because it sets out a record of your
 6 assessment of the capability and intent of the subjects.
 7 Is that right?
 8 **A. Subject or subjects, yes.**
 9 Q. Yes. In this case you had one subject and some
 10 potential associates; is that right?
 11 **A. That's correct.**
 12 Q. Does that, at the top of the page, reflect your position
 13 that, really, only David Totton had been identified as
 14 a subject to you?
 15 **A. It was absolutely clear that David Totton was the only**
 16 **person identified, yes.**
 17 Q. Again, if we pick up the folder, the loose leaf of the
 18 briefing the next day.
 19 I hope you still have yours, sir, at G1/315.
 20 THE CHAIRMAN: I have it, thank you.
 21 MR BEER: When the officers came to be briefed the next
 22 morning, can you see at 325 Mr Totton is now subject 1?
 23 **A. Yes.**
 24 Q. At 327, Mr Rimmer is subject 2. Mr Grainger is
 25 subject 3. Then, at the back of this document, between

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1 pages 335 and 363, are some members of the Corkovic
 2 family and they are identified as associates?
 3 **A. Yes.**
 4 Q. Paul, Adam, Anthony, Jamie and Aaron Corkovic?
 5 **A. Yes.**
 6 Q. That is not how you approached it, is it, that there
 7 were three subjects, Totton, Rimmer, Grainger, and five
 8 associates, Corkovics?
 9 **A. No, my view is we had one subject and the rest were all**
 10 **associates, which was a point that I corrected in the**
 11 **briefing for the benefit of the AFOs.**
 12 Q. Do you know how this has come about, that this is sort
 13 of the opposite of what I was talking about earlier,
 14 that an improvement to the briefing, it may be that this
 15 has gone in the other direction.
 16 **A. Without asking the officer who put the briefing**
 17 **together, clearly I am surmising a little --**
 18 Q. No.
 19 **A. -- I would suggest that they are using a standard**
 20 **PowerPoint presentation where subjects are outlined on**
 21 **certain slides.**
 22 Q. Ie 1, 2, 3?
 23 **A. Yes, and then they have added associates without**
 24 **changing the text from "subjects" to "associates".**
 25 **It was quite clear when I left with the TAC adviser**

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1 **and we'd put the planning in process that we had one**
 2 **subject named Totton, and other possible associates, but**
 3 **there were a lot of unknowns around those associates and**
 4 **that was stressed to the AFOs.**
 5 Q. You said that you corrected it --
 6 **A. Yes.**
 7 Q. -- is that because it was an important point for you the
 8 next morning?
 9 **A. Yes, absolutely, yes.**
 10 Q. I don't think we have a recording, and therefore no
 11 transcript, of the briefing the next morning at 5.00ish,
 12 because our information is that somebody either didn't
 13 press play or pressed play and it didn't record.
 14 **A. It was definitely recording. I wouldn't have proceeded**
 15 **with the briefing without it being recorded.**
 16 Q. Okay, that is the information we have been given, that
 17 although somebody thought they had pressed record, it
 18 didn't record.
 19 **A. Right.**
 20 Q. You corrected this mistake in the course of the oral
 21 briefing the following morning?
 22 **A. Yes, I think it is important, the AFOs are all trained**
 23 **specialists in their own right, clearly and once**
 24 **deployed they are trained to respond to what they see**
 25 **before them but it is only fair professionally to give**

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1 **the AFOs the context around what we are actually talking**
 2 **about and "associates" is a different context to**
 3 **"subjects".**
 4 THE CHAIRMAN: Hang on.
 5 MR BEER: Yes.
 6 THE CHAIRMAN: Only fair to give the AFOs the context about
 7 what we are talking about, is it?
 8 **A. Sorry, I forget my precise words.**
 9 THE CHAIRMAN: That is all right.
 10 **A. The context around what they may actually face.**
 11 THE CHAIRMAN: I see.
 12 **A. The language, from "associates" to "subject" means**
 13 **something different.**
 14 THE CHAIRMAN: That is what you added and I didn't catch up
 15 with. What I have noted --
 16 I'm sorry about this, Mr Beer, but I want to get it
 17 right.
 18 MR BEER: Of course.
 19 THE CHAIRMAN: What I have noted is that although AFOs are
 20 trained specialists, it is only fair to give them the
 21 context about what they face, and then you said
 22 something about associates and subjects.
 23 **A. Yes, that's right. The remark about specialists, sir,**
 24 **was that as an AFO, once deployed under a firearms**
 25 **authority, they are trained to respond to what they see**

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<p>1 before them. The purpose of that briefing is to outline</p> <p>2 the tactic and, as far as possible, what we think they</p> <p>3 may face, given the context of the risk assessment</p> <p>4 meeting, there were so many unknowns around Totton and</p> <p>5 three from five or six that it was important to</p> <p>6 differentiate subjects from associates.</p> <p>7 THE CHAIRMAN: Right, and it was important to differentiate</p> <p>8 subjects and associates.</p> <p>9 MR BEER: Sir, the chief superintendent and I have now been</p> <p>10 speaking for an hour and a quarter.</p> <p>11 THE CHAIRMAN: You have now been going. Yes, we will take</p> <p>12 a break at that point.</p> <p>13 MR BEER: Thank you.</p> <p>14 THE CHAIRMAN: Ten minutes, is that too long?</p> <p>15 MR BEER: No. Thank you very much.</p> <p>16 (3.15 pm)</p> <p>17 (A short adjournment)</p> <p>18 (3.25 pm)</p> <p>19 THE CHAIRMAN: Thank you, Mr Beer.</p> <p>20 MR BEER: Thank you.</p> <p>21 Mr Ellison, we were looking at 2323, at the top of</p> <p>22 the page, Mr Totton is the subject and some others as</p> <p>23 associates. You have written associates potential as</p> <p>24 defined pages 5, 6 and 30.</p> <p>25 Is that a reference to pages 5, 6 and 30 in your</p> <p style="text-align: center;">Page 133</p>	<p>1 Q. Right.</p> <p>2 Carrying on with your log, at page 2325, the threat</p> <p>3 assessment, would you have completed that before going</p> <p>4 off to Mr Shewan?</p> <p>5 A. Yes.</p> <p>6 Q. We can see what you have written on the basis of the</p> <p>7 information you were provided?</p> <p>8 Then, from pages 2327 to 2331, you identify the</p> <p>9 people or groups at risk and why.</p> <p>10 A. Yes.</p> <p>11 Q. Again written before you go off to Mr Shewan?</p> <p>12 A. Yes.</p> <p>13 Q. Your working strategy, an important document, is that</p> <p>14 right?</p> <p>15 A. It is, yes.</p> <p>16 Q. Can you see that on 2333?</p> <p>17 A. Yes.</p> <p>18 Q. There is a signature and a time on that?</p> <p>19 A. Yes.</p> <p>20 Q. Whose is that, and what is the --</p> <p>21 A. I don't recognise the signature but if that is 30/1 at</p> <p>22 05.40, that will be the TFC that I handed this authority</p> <p>23 over to on the following Monday.</p> <p>24 Q. Oh, I see.</p> <p>25 A. We have gone through a page at a time.</p> <p style="text-align: center;">Page 135</p>
<p>1 notes.</p> <p>2 A. From the log, yes, but 5 and 6 were some of those intel</p> <p>3 submissions that we have discussed and 30 runs through</p> <p>4 the chronology in the log.</p> <p>5 Q. So the associates that were potential associates were</p> <p>6 Mr Rimmer and the Corkovics; is that right?</p> <p>7 A. Yes.</p> <p>8 Other names were added as a result of the</p> <p>9 information received off DC Clark.</p> <p>10 Q. Added where?</p> <p>11 A. To the briefing document you have alluded to with the</p> <p>12 subjects, associates, some of the names on there, for</p> <p>13 example Anthony Grainger would have come out of the</p> <p>14 submission of DC Clark, that was the first time --</p> <p>15 Q. Submission to who?</p> <p>16 A. To the officer preparing the briefing pack.</p> <p>17 Q. Do you know whether DC Clark spoke to the officer</p> <p>18 preparing the briefing pack?</p> <p>19 A. I don't know.</p> <p>20 Q. You don't?</p> <p>21 A. I don't know.</p> <p>22 Q. Okay.</p> <p>23 A. I think it is unlikely, I think that the information</p> <p>24 would have been passed through the firearms tactical</p> <p>25 adviser to the briefing officer.</p> <p style="text-align: center;">Page 134</p>	<p>1 Q. I understand.</p> <p>2 Then, importantly, at 2335, can you see effectively</p> <p>3 the decision that you make, is that a record of the</p> <p>4 decision?</p> <p>5 A. It is, yes, yes.</p> <p>6 Q. You are satisfied, based on the intelligence,</p> <p>7 information, threat assessment that you have received</p> <p>8 that the criteria are met in relation to David Totton</p> <p>9 and his associates, yes?</p> <p>10 A. Yes.</p> <p>11 Q. That he or they are in possession of or have immediate</p> <p>12 access to a firearm or other potentially lethal weapon</p> <p>13 or are otherwise so dangerous that the deployment of</p> <p>14 armed officers is considered to be appropriate. We can</p> <p>15 see that you have timed that at 3.30?</p> <p>16 A. Yes.</p> <p>17 Q. That is about an hour and a half after you first met</p> <p>18 Mr Cousen?</p> <p>19 A. Yes.</p> <p>20 Q. You set out on the next page, 2337, the powers to be</p> <p>21 exercised, the threat to life considerations, community</p> <p>22 impact assessment and then your tactical options and</p> <p>23 plan.</p> <p>24 Can we see that you identify, I think, four options</p> <p>25 is that right?</p> <p style="text-align: center;">Page 136</p>

1 **A. Yes, that's correct.**
 2 Q. You reject three of them and decide on MASTS?
 3 **A. That's correct.**
 4 Q. We know that this deployment ended without a discharge
 5 of a firearm or other significant action, so I am not
 6 going to probe too much but just explain in broad terms
 7 why you thought MASTS was appropriate?
 8 **A. The nature of the offence that we thought we were faced**
 9 **with, two vehicles stolen vehicles, high powered**
 10 **vehicles, travelling to the Staffs area, initially to**
 11 **recee and then potentially to commit or attempt to**
 12 **commit a robbery against a cash in transit vehicle. So**
 13 **we have clearly got offenders who are clearly mobile.**
 14 **That would eliminate a number of tactics around, for**
 15 **example, foot-based tactics or building based tactics,**
 16 **some of the tactics that I would suggest would be more**
 17 **controlled because a MASTS is a very dynamic tactic.**
 18 **But the -- there would be other tactics considered,**
 19 **for example disruption of the drops. We would talk to**
 20 **G4S and get the drops moved or we would arrange for**
 21 **a Staffordshire ARV to be outside the location, that**
 22 **might only serve to displace the offence and the threat**
 23 **of harm to another time or another day that we didn't**
 24 **have any control over, so MASTS was the most appropriate**
 25 **tactic to continue with the surveillance team building**

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1 **intelligence and evidence and to have armed support**
 2 **available so that when we reached what I defined as**
 3 **a tipping point later on, we would be in a position to**
 4 **move and negate the threat without the robbery taking**
 5 **place.**
 6 Q. Thank you. We can see, carrying on, at 2343, you set
 7 out contingencies and there are seven of them. I am not
 8 going to go through them.
 9 **A. Yes.**
 10 Q. I think the next page, 2347, is that partially completed
 11 the next day?
 12 **A. 2347?**
 13 Q. Yes, 2347. If you look at the foot of the page, there
 14 is a signature I think by you completed at 4.10 the
 15 following morning. Is that just in relation to
 16 resources to achieve the objectives?
 17 **A. Absolutely, yes.**
 18 Q. But is the rest of that page completed before you go off
 19 and see or speak to Mr Shewan?
 20 **A. Yes, yes the issue around special munitions for example**
 21 **is something I would have to go to the SFC to get**
 22 **permission for, so yes it would be completed before that**
 23 **conversation.**
 24 Q. On 2349 there is a series of actions or tasks arising
 25 from the initial planning. The "initial planning", is

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1 that the meeting at 2.00?
 2 **A. Yes.**
 3 Q. One of those is the third one down:
 4 "MASTS planning for 04.00 hours, parade."
 5 What does that mean, that there needed to be MASTS
 6 planning for 04.00 hours parade?
 7 **A. The tactical adviser, who is obviously numbered there.**
 8 Q. J4?
 9 **A. J4, yes, would have been tasked by me with liaising**
 10 **directly with his colleagues at the Tactical Firearms**
 11 **Unit to make sure that the appropriately skilled**
 12 **resources in the right numbers were warned to parade for**
 13 **duty at 0400 the next day, that vehicles were ready,**
 14 **that the briefing pack was put together, all ready for**
 15 **their arrival so that we were ready to deploy as soon as**
 16 **they were through the armoury and ready for an 05.00**
 17 **briefing.**
 18 Q. I see.
 19 **A. A logistical issue, if you like.**
 20 Q. I see, to make sure you have the right staff for a MASTS
 21 operation?
 22 **A. And that the briefing is ready for them.**
 23 Q. Right, I see. The briefing being ready, do you hand
 24 over to J4 then to prepare the PowerPoint that we have
 25 looked at partially so far?

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1 **A. Yes, when I paraded for duty the next morning, albeit**
 2 **early, the PowerPoint was almost complete and just being**
 3 **completed.**
 4 Q. What is the relationship between you and the PowerPoint;
 5 do you check it?
 6 **A. I do check it, as far as physically possible, yes.**
 7 Q. Do you check it before it is delivered, or as it is
 8 being delivered?
 9 **A. That would be normal practice, before it is delivered,**
 10 **yes.**
 11 Q. Why is that?
 12 **A. We have gone from myself and a TAC adviser in a room to**
 13 **a TAC adviser talking to a third party who was not in**
 14 **the room. There is always scope for conversations to**
 15 **result in some crossed wires, so I just make sure that**
 16 **everything is as discussed.**
 17 Q. The responsibility for ensuring that the briefing is
 18 prepared is handed to J4, the TAC adviser?
 19 **A. Yes, it is handed to a briefing officer via J4.**
 20 Q. Okay, so he is the messenger?
 21 **A. Yes, because of his core role if you like within the**
 22 **Tactical Firearms Unit.**
 23 Q. The things that have motivated you to seek and then, as
 24 we subsequently see, obtain a firearms authority, the
 25 things that impress or concerned you, the things that

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1 you took from the intelligence as being significant or
 2 concerning, they don't necessarily get featured in the
 3 briefing?
 4 **A. No.**
 5 Q. There seems to be a sort of disconnect between the
 6 commander, you, and then what goes on to the PowerPoint?
 7 **A. Yes.**
 8 Q. Is that fair?
 9 **A. I think "disconnect" is unfair.**
 10 Q. Right.
 11 **A. I think the situation you are outlining is fair. A lot**
 12 **of the intelligence and the conversations that took**
 13 **place around it in the risk assessment meeting, the push**
 14 **back we have discussed, is around the tactical firearms**
 15 **commander being able to make a decision that the**
 16 **criteria for armed deployment is met. Once that is**
 17 **actually met, the briefing for the AFOs is a different**
 18 **situation.**
 19 They accept that the criteria is met because the TFC
 20 and the SFC -- the TFC has made that decision, the SFC
 21 has ratified it.
 22 Q. Yes.
 23 **A. Then it is a case of outlining to them who they might**
 24 **come across, what we are expecting to happen in terms of**
 25 **victim, location, offender, type of offence, and they**

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1 **are then trained to deal with what they come across on**
 2 **deployment.**
 3 Q. The reason why I used "disconnect" is that you have
 4 spent a considerable amount of time, two hours and
 5 45-odd minutes, being briefed up, probing, getting more
 6 information, having a bespoke briefing from DC Clark,
 7 thinking about what tactics to deploy, where the risk
 8 and the threat came from.
 9 And you, you know, were a senior officer who have
 10 applied a lot of thought to it on the face of it --
 11 **A. Hmm.**
 12 Q. -- once you have crossed the Rubicon and you have the
 13 SFC's approval, does none of that thought, knowledge,
 14 skill and application get translated into what the AFOs
 15 are briefed up as to what the threat might?
 16 In a moment, when we look, we will see the
 17 PowerPoint and it might be said to be a bit rudimentary.
 18 **A. Yes, no, absolutely. The AFOs need to know that they**
 19 **are faced with potentially a cash in transit robbery,**
 20 **they need to know what the location is, some of the**
 21 **staff will have done a recce of that site, which they**
 22 **had done the previous night, to make sure that they knew**
 23 **where to lay up and stay out of sight but be within**
 24 **reach et cetera. They need to know who they might be**
 25 **faced with and some of the detail around their**

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1 **capability and intent, but they don't need to know the**
 2 **level of detail that goes into the risk assessment**
 3 **meeting.**
 4 Q. I can certainly understand that, I was talking about
 5 capturing and using some of your information -- the
 6 information that you have looked at and analysed -- in
 7 the subsequent briefing.
 8 To take an example, you have said you don't take
 9 warning markers at face value. You want to know what
 10 offence, how old it was, what it involved, whether it
 11 has ended in a conviction or not. Intelligence, you
 12 don't just accept what you were told, you want to have
 13 it graded. You want to maybe cross-check it against
 14 somebody's criminal conviction record to get a rounded
 15 picture of their profile.
 16 Is any of that kind of more delicate, nuanced
 17 assessment translated over to the AFOs?
 18 **A. No, not in the same detail and the reality is that the**
 19 **operational firearms commander who is in the room, the**
 20 **bronze if you would, and their staff need to accept that**
 21 **the tactical firearms commander has assessed all of the**
 22 **available information and intelligence, they have looked**
 23 **at the potential threat, harm and risk, they have**
 24 **established a working strategy and the decision has been**
 25 **made based on all the detail that is available. They**

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1 **don't need to know all of the nuances and the ins and**
 2 **outs of each individual. They need to know they are**
 3 **potentially faced with the two vehicles, with the**
 4 **subject and/or associates who may be in the vehicle with**
 5 **the intent of committing a cash in transit robbery.**
 6 Q. Why are they told anything about the threat that the
 7 subjects pose? When we look at the PowerPoint in
 8 a moment, we see that they are told things, and in a few
 9 weeks' time when we hear from Q9, he is going to tell us
 10 that he was the officer that fired the shot that killed
 11 Mr Grainger --
 12 **A. Right.**
 13 Q. -- he is going to say it is that what he is told about
 14 the threat that the subjects posed that operated on his
 15 mind, amongst other things, in deciding to discharge his
 16 weapon.
 17 You were painting a picture there to say that they
 18 accept as a given that somebody specialist, skilled and
 19 senior has made a decision to authorise firearms. They
 20 have effectively passed on from that point. Theirs is
 21 a different issue, they need to know who the people are,
 22 which cars they are and what are the locations. Why are
 23 they told anything about the threat then?
 24 **A. It gives them some indication of the potential behaviour**
 25 **that a subject or an associate might exhibit, but beyond**

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1 **that they are trained in their own way as AFOs to**
 2 **respond to what they see before them.**
 3 Q. Okay. I will carry on with where we were.
 4 Can we move on, please, to page 2353. Just to
 5 note -- in fact if we look at 2355 first, strategic
 6 firearms commanders' authority. Is that at 5.10, that
 7 is it was ratified by --
 8 **A. That the second phone call I referred to earlier, yes.**
 9 Q. If you go back a page to 2353, he also ratified the
 10 tactics and gave authority for special munitions. Is
 11 that right?
 12 **A. That's correct, yes.**
 13 Q. At the same time, 5.10?
 14 **A. Yes.**
 15 Q. You didn't have a face-to-face meeting with Mr Shewan on
 16 either of the two conversations. They were both phone
 17 calls; is that right?
 18 **A. That's right, yes.**
 19 Q. You provided him with the intelligence that had been
 20 given to you; is that right?
 21 **A. That's right, yes.**
 22 Q. Can we look, please, at tab 3 in the bundle, at his
 23 page 2275. Which is his record of the briefing from
 24 you? Can you see that?
 25 **A. I can, yes.**

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1 Q. Although it is not your note, I just want to go through
 2 some parts of it.
 3 At 4.45, "Discuss Op Shire with [you], previous
 4 knowledge of Op Shire principals, David Totton [who is
 5 thereafter referred to as T] significant OCG criminal,
 6 extreme propensity for violence. Section 18 conviction.
 7 Others, Aaron and Jamie Corkovic, both violent and
 8 weapons, both Shire [I think he has called it 'spire']
 9 targets."
 10 Then some intelligence on 30 September, I think that
 11 is 2011:
 12 "Totton, Corkovic and Corkovic planning to commit
 13 robberies with stolen motor vehicle."
 14 Then it goes on, can you see for the rest of the
 15 page?
 16 **A. I can, yes.**
 17 Q. With the dates and the intelligence grading?
 18 **A. Yes.**
 19 Q. Can you see that?
 20 **A. Yes.**
 21 Q. Did you provide him with this intelligence, these dates
 22 and this intelligence grading?
 23 **A. I would have done, yes.**
 24 Q. Did you do that proactively or did he ask?
 25 **A. I don't recall the specific wording of the phone call to**

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1 **be honest, I would suggest the conversation was probably**
 2 **a combination of the two.**
 3 Q. In the normal course of events, would this be the usual
 4 thing that would happen? That the ACC would be asking
 5 you for the intelligence as a first base?
 6 **A. Well, that is why I say, I have probably offered it and**
 7 **my expectation would be I would offer it as a matter of**
 8 **routine and I would expect the SFC to come back and ask**
 9 **me any questions in the same way I would have of the**
 10 **SIO.**
 11 Q. If you didn't provide it the ACC would ask about it?
 12 **A. Yes, I would expect them to, yes.**
 13 Q. Including dates, detail and grading?
 14 **A. Yes.**
 15 Q. Thank you.
 16 We have seen I think that authority was granted at
 17 5.10, so does that mean that there was about 25 minutes
 18 between the first call and authority being granted?
 19 **A. Yes, for the SFC to return the call, yes.**
 20 Q. How long was the second call, can you remember?
 21 **A. Duration?**
 22 Q. Yes.
 23 **A. I don't remember. No.**
 24 Q. We have seen that he ratified your tactics and gave
 25 authority for special munitions, yes?

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1 The next thing that happens really, is this right,
 2 is the briefing the following morning?
 3 **A. Yes.**
 4 Q. As a general question, the PowerPoint presentation,
 5 whose responsibility was it to, (a) create it and (b) to
 6 ensure that it was accurate?
 7 **A. It will have been created by a member of staff in the**
 8 **Tactical Firearms Unit following contact from the**
 9 **tactical adviser. TFC's responsibility to make sure it**
 10 **is accurate.**
 11 Q. Do you have any understanding of how the member of
 12 briefing staff goes about creating it?
 13 **A. No, I don't, other than through dialogue with the**
 14 **tactical adviser who was with me in the risk assessment**
 15 **meeting.**
 16 Q. In your experience, is the tactical adviser always in
 17 the risk assessment meeting?
 18 **A. Yes.**
 19 Q. Can we look, please, at G1/329, which is the threat
 20 assessment for Mr Grainger. We have seen that Mr Rimmer
 21 and Mr Grainger have become subjects, do you in fact now
 22 know how that happened?
 23 **A. No. Other than I think it is inappropriate use of the**
 24 **term and it should have been associates, which would**
 25 **have been corrected as I say at the back of the recorded**

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1 **briefing.**
 2 Q. You can see it says warnings, weapons, "Previously
 3 conspired to commit robberies with firearms", had you
 4 been told that?
 5 **A. No, other than the reference to the offence with**
 6 **Stuart Grainger being convicted, that would be the only**
 7 **link I would put with that kind of information.**
 8 Q. I mean on its face, would you agree that that indicates,
 9 as a matter of fact, that Mr Grainger had used a firearm
 10 to commit robberies?
 11 **A. Not necessarily, I would suggest it serves to outline**
 12 **that he has been involved in a group that has conspired**
 13 **to commit robberies with firearms but not necessarily**
 14 **him personally.**
 15 Q. Why do you read it that way?
 16 **A. I would suggest that is just down to experience, having**
 17 **pushed back and asked the question enough to find out**
 18 **that it is not as straightforward as Anthony Grainger**
 19 **would have been a person with the firearm in one of**
 20 **those occasions.**
 21 Q. I don't think you have a note of being told anything
 22 about Mr Grainger. All you have I think is
 23 a recollection now of something being said about
 24 Mr Grainger, but in fact principally relating to his
 25 brother Stuart Grainger?

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1 **A. Yes, Anthony Grainger was not mentioned at all through**
 2 **the initial risk assessment meeting with the DI. It was**
 3 **only after DC Clark came in that the name was mentioned**
 4 **at all.**
 5 Q. As far as we have seen, there are not even allegations
 6 that Mr Grainger conspired to commit robberies, plural,
 7 with firearms. Do you know, as a matter of fact, now
 8 where that came from?
 9 **A. No. No.**
 10 Q. The next thing he said about him, that he has a violence
 11 marker, and that there were numerous arrests of him for
 12 section 18 and section 20 offences, had you been told
 13 anything about that?
 14 **A. No. It might assist, just if I offer that the officer**
 15 **tasked with putting a briefing package together for the**
 16 **AFOs within the Tactical Firearms Unit will themselves**
 17 **go and access OPUS to access this kind of data. So they**
 18 **will be briefed by the tactical firearms adviser and**
 19 **they will access OPUS themselves, so my presumption**
 20 **would be that they have pulled that data off OPUS.**
 21 Q. Yes, I mean we in fact I think know that is not
 22 accurate. He had been arrested for two section 20
 23 offences, alleged to have been committed on the same
 24 occasion, once, and had been arrested once for
 25 a section 18.

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1 **A. I am not aware of that detail.**
 2 Q. No. Okay.
 3 When you saw that, or heard that, did you think,
 4 "Hold on, I don't know anything about that"?
 5 **A. No. Because of the way the meeting ran with this wide**
 6 **range of unknowns in terms of persons who might be**
 7 **working with David Totton, I accepted that as the**
 8 **briefing officer was putting the package together, they**
 9 **would have conducted their own research off OPUS. But**
 10 **I didn't have any more background detail than that.**
 11 Q. Again, if I can press you on that a little bit, you have
 12 said that you rely on the investigation team, because
 13 they have lived and breathed the operation for days,
 14 weeks, perhaps months even. That they have detailed and
 15 maybe long-standing knowledge of their subjects and
 16 their associates. And that specialist officers,
 17 including from the intelligence section, would work up
 18 subject profiles about them, an intelligence package.
 19 That doesn't seem to get translated into this.
 20 **A. No, and during the risk assessment meeting of course**
 21 **there was not a nominal profile prepared in relation to**
 22 **Anthony Grainger at all.**
 23 Q. No.
 24 **A. It was only when David Clark came in as the local**
 25 **Salford OCG expert in the team that his name was first**

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1 **mentioned, but there wasn't a prepared pack.**
 2 Q. I mean I could equally pick Mr Totton as an example,
 3 there was a pack by them for him, and I think there was
 4 for Mr Rimmer by then?
 5 **A. Yes.**
 6 Q. The contents of those and the thought that has gone into
 7 those doesn't seem to get translated into the PowerPoint
 8 to the armed officers, ie somebody who has got no
 9 connection at all, a TFU briefing officer reinvents the
 10 wheel by going on to OPUS and pulling off OPUS what they
 11 consider to be important?
 12 **A. Yes, that is a fair observation.**
 13 Q. Lastly, it is said that he is a Group 1 offender. What
 14 do you understand a Group 1 offender to mean?
 15 **A. Group 1 offender is the term applied to someone who has**
 16 **data held on our system under MOPI, management of police**
 17 **information. It is a marker which relates to someone**
 18 **who is either connected to or responsible for a series**
 19 **of offences which might actually bring harm to**
 20 **a community or pose threat to a community. It doesn't**
 21 **need to be a conviction, it could just be connected to.**
 22 **And it is a marker that can be applied when a person**
 23 **is first generated on the system manually, or equally**
 24 **the system can apply that marker automatically once**
 25 **a series of qualifying offences have been connected to**

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1 **the individual. I think it stays on for up -- until the**
 2 **age 100, but it is a MOPI requirement.**
 3 Q. Do you understand that it is related to the most
 4 dangerous offenders, whether through violence or the
 5 commission of sexual offences?
 6 **A. I do understand that. I think there was also a list of**
 7 **qualifying, other qualifying offences which are**
 8 **stipulated by legislation that I cannot recount now, but**
 9 **it is more than just violence or sexual offences, there**
 10 **is a specific list of other offences.**
 11 Q. Yes. Had you been given any information about
 12 Mr Grainger, that led you to believe that that
 13 description of him was satisfied?
 14 **A. As a Group 1 offender? With the detail I had been**
 15 **offered by DC Clark alone, no. But again, the**
 16 **presumption would be that that has come off the OPUS**
 17 **system when the briefing pack has been put together.**
 18 Q. Would the briefing pack be put together that night or
 19 first thing in the morning?
 20 **A. It depends on the timing of deployment. Whether it was**
 21 **started that night and completed the next morning,**
 22 **I couldn't say without asking the officer responsible.**
 23 Q. When you made a decision that the grounds for deployment
 24 of armed officers were satisfied, which decision was
 25 subsequently ratified by Mr Shewan, that was partly

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1 based, is that right, on the intelligence that you had
 2 been provided concerning the Corkovics?
 3 **A. No, it was provided around the intelligence primarily**
 4 **around Mr Totton.**
 5 Q. Right, and to what extent did the intelligence
 6 concerning the Corkovics play a part?
 7 **A. The Corkovics had clearly played a part as an earlier**
 8 **focus of Operation Shire, I recall from the briefing**
 9 **that the focus of the operation shifted from the**
 10 **Corkovics to Mr Totton. There was intelligence on the**
 11 **system that linked Totton with the Corkovics and Totton**
 12 **with Rimmer and the association map span out from there.**
 13 **But it was primarily around -- I mean I am quite clear**
 14 **in my mind this was primarily about assessing the**
 15 **risk -- the threat and risk offered by Mr Totton and**
 16 **others --**
 17 Q. Yes.
 18 **A. -- not the Corkovics per se.**
 19 Q. I think we have maybe covered this earlier, even though
 20 he was the individual that offered the highest threat or
 21 the highest risk, you would consider it incumbent to try
 22 and assess if other targets were identifiable to work
 23 out the threat or risk that they posed?
 24 **A. Yes, at that time from the surveillance detail that we**
 25 **had, occupants of the other vehicle or anyone in with**

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1 **Mr Totton had not been identified, so that was not**
 2 **possible.**
 3 Q. In your case?
 4 **A. Yes, absolutely, yes.**
 5 Q. Can we turn then to the rest of that day, back in your
 6 tab, which is tab 4, at 2361.
 7 **A. Yes.**
 8 Q. Tab 4, 2361, you record the briefing being delivered at
 9 04.58 hours at Openshaw, yes?
 10 **A. Yes.**
 11 Q. Can you see after that it says:
 12 "Intel ICI confirmed."
 13 What does that mean?
 14 **A. That is reference to Mr Totton in terms of the**
 15 **intelligence that is offered on the briefing package and**
 16 **the ICI refers to some detail around the threat**
 17 **assessment, his identity, his capability, and his**
 18 **believed intent.**
 19 Q. What does the note mean, what does it represent that
 20 intel and the identity, capability and believed intent
 21 is confirmed?
 22 **A. I had asked that both DI Cousen and DC Clark both**
 23 **attended that briefing the next day, so as part of the**
 24 **briefing process to confirm that nothing had changed**
 25 **overnight in relation to the details offered by Totton**

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1 **the previous evening. Just to make sure nothing had**
 2 **changed.**
 3 Q. Were Messrs Cousen and Clark present in the course of
 4 the briefing?
 5 **A. They were.**
 6 Q. Did they correct any part of it in any way?
 7 **A. Not that I can recall.**
 8 Q. To the best that you can recall.
 9 **A. No, not that I can recall.**
 10 Q. I think you moved to State Green at 5.15; is that right?
 11 **A. Straight from the briefing, yes.**
 12 Q. The dedicated surveillance unit confirmed both vehicles
 13 were mobile, the BMW on the A34 south bound and the Audi
 14 A6 on the A6 south bound?
 15 **A. Yes, I recall clearly both vehicles, it was some**
 16 **surprise actually, that they were already mobile as we**
 17 **came out of the briefing.**
 18 Q. What is the next line, "Totton believed driving ..."?
 19 **A. "Totton believed driving BMW."**
 20 Q. Can you read the next entries, at 5.20?
 21 **A. 0520 hours:**
 22 **"DSU confirms subject has placed a tyre wrench and**
 23 **two canisters of petrol in the boot of the Audi before**
 24 **moving off."**
 25 Q. Yes.

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1 A. **0550 hours:**
 2 "Staffs FDO updated by TFC [myself]."
 3 Q. That is the Staffordshire firearms duty officer?
 4 A. **Duty inspector if you like, in their control room, yes.**
 5 **0555 hours:**
 6 **"DSU confirms suspect vehicles now plotting off**
 7 **around Bury Hill Road."**
 8 **Which is close to the G4S site in Hanley.**
 9 Q. "Plotting off", meaning?
 10 A. **Static. Parked up separately. What appear to be**
 11 **strategic points close to the site.**
 12 Q. Thank you:
 13 "TFU close to location."
 14 A. **Yes, "Remain State Green".**
 15 Q. Thank you. 0620 hours, if you can read that entry
 16 please.
 17 A. **"DSU follows both suspect vehicles away from Bury Hill**
 18 **Road and Hanley area along A34/A50 north. MASTS team**
 19 **updated and instructed to move off along similar route."**
 20 Q. Yes, if you carry on please.
 21 A. **Sure. 0625 hours:**
 22 **"Both suspect vehicles north through Holmes Chapel**
 23 **A50."**
 24 **0635:**
 25 **"Staffs FDO updated."**

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1 **Again, that was by myself.**
 2 **0715 hours:**
 3 **"MASTS team instructed to return to the Tactical**
 4 **Firearms Unit. DSU remain on both vehicles. Both**
 5 **return to the Worsley area. BMW to Eldon Avenue,**
 6 **confirmed Totton driving. Audi confirmed as four up**
 7 **[indicating four persons on board], IDs to be confirmed**
 8 **and parked on Edgerton Park."**
 9 **Do you want me to continue?**
 10 Q. Yes, please.
 11 A. **0720 hours:**
 12 **"Black Renault Megane [with a registration]**
 13 **belonging to Robert Rimmer sited close to the BMW and**
 14 **Audi."**
 15 **0815 hours:**
 16 **"MASTS TFU debrief."**
 17 **That refers to the team coming back into the**
 18 **firearms unit to debrief the deployment:**
 19 **"No issues raised regarding the planning other than**
 20 **the need to parade for duty earlier tomorrow at**
 21 **0300 hours."**
 22 **That was in response to the fact the vehicles had**
 23 **already moved off when we came from the briefing:**
 24 **"Bury Hill Road site to be revisited that morning by**
 25 **the ops team for a more detailed recce, to take photos**

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1 **and to assist with the planning process. Then at**
 2 **0830 hours we stood the ops team down, updated the**
 3 **Staffordshire TFC by phone and their FDO.**
 4 Q. Stopping there, what had happened was very shortly after
 5 the briefing, the two cars were mobile, or you were told
 6 they were mobile, they were seen in Staffordshire,
 7 nothing actually happened?
 8 A. **Hmm.**
 9 Q. They travelled back to the GMP area, they parked up and
 10 you stood the team down?
 11 A. **Yes, and I suppose more significantly I pulled the MASTS**
 12 **team off the surveillance once they were back in the**
 13 **Manchester area, there was no suggestion that they**
 14 **offered a threat to the Manchester area, the threat was**
 15 **very Stoke-on-Trent.**
 16 Q. Thank you. That is early morning on the 26th?
 17 A. **Yes.**
 18 Q. It was always planned to make a deployment the next day;
 19 is that right?
 20 A. **Yes, had there not been a development on the 26th.**
 21 Q. Yes, to cause you not to?
 22 A. **Yes, it was not clear whether there was an attempt at**
 23 **a single recce, two recces or whether three or four**
 24 **would be carried out before any attempt at an offence.**
 25 Q. Did you parade again at I think 4.00 the next morning

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1 back in the TFU at Openshaw?
 2 A. **Yes.**
 3 Q. Was the same briefing document as the one that we have
 4 previously looked at used to brief up the team?
 5 A. **Whether it was exactly the same or not without seeing**
 6 **it, I couldn't say now.**
 7 Q. Okay.
 8 In brief, did the firearms team that day remain at
 9 Openshaw on standby throughout the day?
 10 A. **On the 27th.**
 11 Q. Yes.
 12 A. **Not throughout the day, no. I was conscious of the fact**
 13 **that they were coming on duty at 3.00 and 4.00 in the**
 14 **morning respectively on the two days --**
 15 Q. Yes, I think you stood them down at 7.30?
 16 A. **Yes.**
 17 Q. The subjects didn't move, the cars didn't move --
 18 A. **No. I'm sorry, I take your point.**
 19 Q. They came on at 4.00 and you stood them down at 7.30 in
 20 the morning?
 21 A. **From this authority, they would still be in work at the**
 22 **Tactical Firearms Unit for some time but yes, released**
 23 **from this authority.**
 24 Q. In general terms why was that that you stood them down
 25 from this authority only three and a half hours after

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1 them coming on?
 2 **A. Well the intelligence offered at the risk assessment**
 3 **meeting was very specific. This was about a threat to**
 4 **a cash in transit vehicle leaving the G4S site at**
 5 **Hanley, Stoke-on-Trent, so having discussed it with**
 6 **Rob Cousen and the TAC adviser we took the view that**
 7 **what had happened was we had seen a second recce of the**
 8 **site that morning with no further action taken and**
 9 **because of their return to the Manchester area, I took**
 10 **the view that the threat against G4S staff and the cash**
 11 **in transit delivery had actually negated.**
 12 Q. Thank you.
 13 If you look at 2363, and you might be on that page
 14 already.
 15 **A. Yes.**
 16 Q. Can you see an entry at 0700 hours which reads, I think:
 17 "As at 0600 hours, ops team remains on stand by at
 18 Openshaw TFU. DI Cousen liaises G4S and confirms that
 19 the depot delivery drops over the weekend are Saturday
 20 the 28th, first drop at 08.00, last drop at 09.30 hours
 21 and then Sunday the 29th, two at 10.30 hours."
 22 **A. Yes.**
 23 Q. Is that right?
 24 **A. Yes.**
 25 Q. "All seven drops are believed to be coin drops, although

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1 this cannot be confirmed until 09.30 hours."
 2 Detective Inspector Cousen had the ability, the
 3 facility, to make enquiries with G4S and establish the
 4 timing, frequency and believed nature of the drops?
 5 **A. Yes, that's correct, we had quite a lengthy conversation**
 6 **about whether there was a need to reparate at the same**
 7 **time on the Saturday morning. None of the recces had**
 8 **taken place at the weekend and through DI Cousen's**
 9 **liaison with G4S we established that the way the**
 10 **business ran at the weekend differed significantly to**
 11 **Monday to Friday.**
 12 Q. If we look, please, at page 2389 in the same tab.
 13 **A. Yes.**
 14 Q. Is this an email that you sent to Mr Shewan, blind
 15 copied to Mr Cousen, your TAC adviser and I think G1 was
 16 the operational firearms commander --
 17 **A. Right.**
 18 Q. -- the bronze --
 19 **A. Right, yes, okay.**
 20 Q. -- at 9.00 or 9.04 that morning?
 21 **A. Yes.**
 22 Q. I am not going to read all of it, but look at the third
 23 bullet point in particular:
 24 "Information from G4S for Saturday, 28th and Sunday,
 25 29 January, shows a far lower level of van activity from

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1 the depot, with no early morning vehicles leaving the
 2 site. The vans will be carrying loads that are
 3 significantly reduced in value, comprising mainly coin
 4 drops and their timings are as follows ..."
 5 They are set out and redacted in this document:
 6 "None of these deliveries tally with the recces that
 7 have been observed. There is no intelligence to suggest
 8 that the subjects are aware of any police interest or
 9 activity surrounding their plans. Both vehicles are, as
 10 you know, outstanding stolen motor vehicles on cloned
 11 VRM plates and the subjects have carefully parked them
 12 in separate locations for at least the last 72 hours.
 13 I have reviewed the threat assessment, while the
 14 situation clearly differs for the weekend period the
 15 overall threat remains assessed at high and the working
 16 strategy is unchanged as it remains appropriate in
 17 relation to the threat.
 18 "TAC advice continues to support the preferred
 19 tactical option of a MASTS team deployment to support
 20 the surveillance officers. In that respect I consider
 21 that the criteria continues to be met for the deployment
 22 of armed officers on Op Shire on the basis I have reason
 23 to suppose that officers may come across persons likely
 24 to have access to firearms or immediate access to
 25 firearms or other potentially lethal weapon, and those

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1 persons may be otherwise so dangerous that the
 2 deployment of armed officers is appropriate."
 3 Then you continue, noting the update on the recces
 4 and the G4S position over the weekend:
 5 "I propose that Staffs police are briefed with
 6 a view to providing 'van guard, follow that van'
 7 activity in place on the limited weekend deliveries.
 8 This will form a contingency and enable the disruption
 9 of any related criminal activity over the two-day
 10 period."
 11 Is that right?
 12 **A. That's right, yes.**
 13 Q. Cutting through that, you thought that the threat that
 14 remained could be properly addressed by disruption
 15 activity?
 16 **A. For the Saturday and Sunday, yes, but from the Monday,**
 17 **I maintained that a MASTS was the appropriate tactic.**
 18 Q. Yes, and that is because you had intelligence that this
 19 was believed to be a cash in transit robbery being
 20 planned, that the cash in transit deliveries were less
 21 frequent and of lower value, and that this was
 22 a proportionate response to it?
 23 **A. Yes. Yes. That was supported by what was seen with the**
 24 **early morning recces.**
 25 Q. Did Mr Shewan ratify your decision?

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1 **A. He did. He did. With the caveat that I spoke to the**
 2 **Staffs SFC first to make sure that they were happy. The**
 3 **manual of guidance, as it was referred to then --**
 4 **although that has changed since -- is very clear about**
 5 **the fact that cross border operations have to have that**
 6 **SFC to SFC conversation taking place to make sure that**
 7 **the host force is happy to either take command and**
 8 **control themselves or for GMP to retain command and**
 9 **control.**
 10 **So that was his caveat but once I had spoken to my**
 11 **colleague in Staffs and confirmed that was the case,**
 12 **Mr Shewan was happy with the proposed course of action.**
 13 Q. In your witness statement, your first witness statement,
 14 you say:
 15 "I reviewed all of the available intelligence and
 16 information with DI Cousen and whilst the likelihood of
 17 a weekend robbery appeared highly unlikely, I decided
 18 that the threat assessment and working strategy outlined
 19 in my log remained unchanged."
 20 In fact was the authority continued until
 21 30 January?
 22 **A. Yes, that's correct.**
 23 Q. You thought that the likelihood of a weekend robbery
 24 appeared highly unlikely?
 25 **A. I thought yes, exactly the surveillance, the**

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1 **intelligence, what we knew from G4S, I thought it was**
 2 **highly unlikely but could not rule it out all together.**
 3 **So the most propriety and proportionate tactic would**
 4 **have been then to put marked cars on from Staffordshire**
 5 **to prevent, just make absolutely sure that the offence**
 6 **did not happen over the weekend period.**
 7 Q. Thank you.
 8 Just two sets of last questions from me, please, if
 9 you go on a last couple of pages to 2393, on there, and
 10 on 2395, there are some photographs of subjects, I think
 11 Mr Totton, and some of the Corkovics, yes?
 12 **A. Yes. Yes.**
 13 Q. Some details of cars and addresses, was that part of
 14 your briefing pack?
 15 **A. No.**
 16 Q. What is it?
 17 **A. I don't recognise the document, I would presume it has**
 18 **come from the surveillance team.**
 19 Q. Thank you.
 20 Then at 2397 we have another copy of the document we
 21 have been all looking at, the PowerPoint for the 26th?
 22 **A. Yes.**
 23 Q. On 2399, there is some handwriting; is that your
 24 handwriting?
 25 **A. It is, yes, yes.**

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1 Q. Can you tell us what the purpose of it was? It may be
 2 you want to read it.
 3 **A. Yes, these are points for me to make going through the**
 4 **PowerPoint presentation before it is delivered and some**
 5 **points as a prompt for me it make for clarity of the**
 6 **staff at the end of the briefing. For example, towards**
 7 **the right there I have made the point about be aware on**
 8 **Robin Rimmer's car, just to be aware that it is not**
 9 **involved in the recess but it is believed to have**
 10 **liaised with the two other vehicles. Additional context**
 11 **to offer the AFOs in relation to those vehicles.**
 12 Q. Over the page, at 2401, can you see some additional
 13 words "Machete 2001 ..."
 14 Does that say, "Firearm links"?
 15 **A. FI links, yes, Foxtrot India links.**
 16 Q. Then:
 17 "Extreme levels of ..."
 18 **A. "Extreme levels of personal violence."**
 19 Q. Is that something that you would have added for you to
 20 read out in the course of the briefing?
 21 **A. Yes, and actually as a reminder to the staff that it**
 22 **might be that less lethal options may be appropriate in**
 23 **detaining that individual. There are Foxtrot India**
 24 **links, but also he has that propensity to personal**
 25 **violence that might come across using whatever weapons**

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1 **he is carrying for cash in transit. We do see cash in**
 2 **transits being committed with sledgehammers and bars and**
 3 **what have you, it might be that less lethal options are**
 4 **appropriate but they need to be aware of the fact that**
 5 **we have an individual here with quite a short fuse.**
 6 Q. At 2403 you have added a note against Mr Rimmer,
 7 "Believed active in cash in transit robberies with
 8 Mr Totton".
 9 I think that is made out on the basis of the notes
 10 that you had, we have seen earlier?
 11 **A. Yes, it is, yes.**
 12 Q. Before DC Clark came into the room, for Mr Grainger at
 13 the foot the page you have added, "Believed planning to
 14 commit offences with Totton". Where had that come from?
 15 **A. Mr Clark's submission. I had not heard Grainger**
 16 **mentioned at all before DC Clark came into the room.**
 17 Q. So far you have told us about Mr Clark saying that there
 18 was a robbery when firearms were discharged of which
 19 Mr Stuart Grainger was convicted --
 20 **A. Yes.**
 21 Q. -- and Anthony Grainger was connected in some way.
 22 **A. He was certainly named. The extent of his connection**
 23 **I don't know.**
 24 Q. You haven't said so far anything about
 25 Mr Anthony Grainger being involved in planning to commit

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1 offences with Mr Totton?
 2 **A. No, I haven't and I don't recall having that**
 3 **conversation but the fact I have noted it here, that can**
 4 **only have come from DC Clark's submission because he was**
 5 **not named at all before he had come into the room.**
 6 Q. That is probably down to DC Clark as well?
 7 **A. From that input, yes.**
 8 MR BEER: Thank you very much. They are the only questions
 9 that I ask, thank you.
 10 Questions from MR THOMAS
 11 MR THOMAS: Just one question, sir.
 12 Forgive me, I represent Mr Grainger's mother,
 13 stepfather and brother.
 14 **A. Thank you.**
 15 Q. Can I just ask you just one question, and it relates to
 16 some evidence you gave a little earlier on this morning
 17 in relation to the recordings of briefings.
 18 **A. Yes.**
 19 Q. In a response to Mr Beer you said it was definitely
 20 recorded. That was your recollection.
 21 Can I just ask you just to explain what -- when you
 22 had these briefings, what your process was to check that
 23 the briefings were being recorded. What would you do?
 24 **A. The way the system works is once everyone is in the room**
 25 **and the room is secure, the PowerPoint is ready, the**

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1 **briefing officer, who is typically the OFC, the bronze**
 2 **if you like, will open up the briefing with**
 3 **an introduction and state the time as they press play.**
 4 **There is a very long electronic beep that tells you the**
 5 **recording machine is kicking in, at the end of that**
 6 **beep, clearly 99 times out of 100 you know you are being**
 7 **recorded.**
 8 Q. Yes.
 9 **A. At the end of the recording -- I say I know it was being**
 10 **recorded as well, because there is a time in my log that**
 11 **talks about -- I think it was 04.58. To me that is 5.00**
 12 **in the morning. It is 04.58 because that is the**
 13 **specific digital time that has been announced for the**
 14 **benefit of the recording. At the end of the recording**
 15 **the finishing time is also stipulated and the recording,**
 16 **the disk, is then removed from the machine and sealed**
 17 **with a serial number on it.**
 18 **We don't actually play the disk back and make sure**
 19 **that it has been recorded, but that is how the process**
 20 **works.**
 21 Q. You have a very clear process that you have set out
 22 there with the beep and everything --
 23 **A. Yes.**
 24 Q. -- and obviously you and your team understand the
 25 importance of these recordings --

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1 **A. Yes.**
 2 Q. -- it is vital to make sure that the equipment is
 3 working and the beeps are happening and so forth, you
 4 would agree?
 5 **A. I would agree, yes and I don't think anyone in the room**
 6 **that Thursday morning had any reason to believe that the**
 7 **machine was not working.**
 8 Q. Nobody said to you, "We have made a mistake, we have
 9 overrecorded or anything". Nothing like that was ever
 10 said, was it?
 11 **A. No, and in fact you cannot overrecord because it is**
 12 **a new disk, it goes in, it comes out and it is placed in**
 13 **and it is sealed numerically.**
 14 MR THOMAS: That is all I ask, thank you very much.
 15 Questions from MS MURPHY
 16 MS MURPHY: Good afternoon, my name is Fiona Murphy and
 17 I ask questions on behalf of Gail Hadfield-Grainger,
 18 Mr Grainger's partner.
 19 **A. Hello.**
 20 Q. I need not detain you very long, I just have a couple of
 21 points of clarification to pick up from your evidence,
 22 please.
 23 The first concerns contingencies and you have been
 24 explaining I think it was at the prompting of Mr Shewan
 25 that you looked at contingencies, and we have been

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1 hearing about the contingency over the weekend and
 2 visible ARV presence --
 3 **A. Yes.**
 4 Q. I believe it is also the case, is this right, that with
 5 regard to the planning for 26 January, you also had
 6 regard to contingencies that there might be a loss of
 7 surveillance. Is that correct?
 8 **A. Yes, it is.**
 9 Q. Both a total loss of surveillance and a partial loss of
 10 surveillance?
 11 **A. Yes.**
 12 Q. Was that contingency to be met in a similar way than the
 13 plan over the weekend to rely on the ARVs from the
 14 Staffordshire police --
 15 **A. Yes, it was.**
 16 Q. -- and to effectively disrupt?
 17 **A. Sorry, it was and part of the conversation with the**
 18 **Staffordshire SFC in terms of making sure he was happy**
 19 **to host GMP's armed operation was to make sure that ARV,**
 20 **armed assets from Staffordshire, were available a short**
 21 **distance away. That conversation was confirmed between**
 22 **both respective SFCs.**
 23 Q. We can look at the document if need be, but I also
 24 believe it is the case that the plan in such an event
 25 was for DI Cousen to liaise with G4S to inform them of

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1 the threat and so that they could undertake some
 2 management of that threat?
 3 **A. Yes, if we had had an extended partial loss or indeed**
 4 **a full loss, the sensible thing to do would have been**
 5 **not just to get the ARVs into the area but to prevent**
 6 **the next high value cash in transit from leaving the**
 7 **yard.**
 8 Q. Thank you.
 9 In the questions that you have been asked by
 10 Mr Beer, you were explaining about the importance of
 11 considering less lethal options --
 12 **A. Yes.**
 13 Q. -- with regard to the threat to Mr Totton.
 14 THE CHAIRMAN: Posed by Mr Totton, yes.
 15 MS MURPHY: I am sorry, sir, thank you.
 16 **A. Yes.**
 17 Q. Is this right, in considering that risk and the need to
 18 consider less lethal options, you had specific regard in
 19 your log to the need to consider those less lethal
 20 options should a firearm not in fact be sighted. Is
 21 that something you gave specific --
 22 **A. It is, it is actually a reminder to AFOs, they would**
 23 **operate on that basis anyway but it is a reminder.**
 24 Q. That is a reminder that you took the trouble to place in
 25 your log?

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1 **A. Yes.**
 2 Q. Do you now recall whether that was a reminder that you
 3 specifically gave to the firearms officers?
 4 **A. I don't, I am afraid, no.**
 5 Q. That is a matter you would expect them to be aware of?
 6 **A. Yes.**
 7 Q. Is it also the case that in your tactical planning, you
 8 had specific regard to the potential points of conflict.
 9 Is that correct?
 10 **A. Yes, it is, yes.**
 11 Q. Just to deal with this efficiently, really, if I could
 12 just summarise what I discerned from what you were doing
 13 there, is that you were looking at risks at the point of
 14 an offence being committed?
 15 **A. Not necessarily, no. It could be risks at the point of**
 16 **police engagement with the subject vehicles.**
 17 Q. Could we have a quick look at that part of your log,
 18 please, I think that might be clearer. It is at tab 4,
 19 and the page number is 2327, please.
 20 **A. Yes.**
 21 Q. We see there I believe that you are addressing the level
 22 of risk and to whom those risks are arising; is that
 23 correct?
 24 **A. That's correct, yes.**
 25 Q. We have a bit of police parlance there, I think,

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1 "Potential point of conflict"?
 2 **A. That's right, yes.**
 3 **Point of contact.**
 4 Q. Sorry?
 5 **A. "Potential point of contact."**
 6 Q. I am reading off the pro forma "conflict", but perhaps
 7 it amounts to the same thing.
 8 **A. Sorry, yes.**
 9 Q. We have in the first category you have considered staff
 10 of G4S in the delivery vehicle, because you are looking
 11 at a CVIT robbery, yes?
 12 **A. Yes.**
 13 Q. Then you go on to consider the alternative possibility,
 14 the staff at the G4S depot?
 15 **A. Yes.**
 16 Q. Over the page, members of the public along the delivery
 17 route?
 18 **A. Yes.**
 19 Q. Here we are talking about bystanders who might be nearby
 20 at the time of that point of contact between the police
 21 and the suspects or between the suspects and members of
 22 G4S?
 23 **A. Yes.**
 24 Q. Also you consider members of the public at the
 25 alternative option, the G4S depot?

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1 Is this right, that you are thinking in the round
 2 about who are the people who might be at risk, where
 3 might they be at risk and therefore addressing your
 4 tactical plan to the identification of all of those
 5 different risks. Is that basically what it amounted to?
 6 **A. Yes, it does, yes.**
 7 Q. In respect of each of the risks we have been talking
 8 about just there, you identified the risks as high, is
 9 that right?
 10 **A. Not all of them, no. Staff at the G4S depot for example**
 11 **was medium.**
 12 Q. Absolutely, and I think I am right in -- apologies for
 13 that, I think I am right and the reason for that was
 14 that that was not considered to be a particularly likely
 15 point of involvement from the subjects?
 16 **A. The suggestion was the vehicle was at risk, not the**
 17 **depot, yes.**
 18 Q. Thank you.
 19 Finally this in terms of matters I wanted to ask you
 20 about. Can I ask you to have look at a document also in
 21 that section of your bundle, it is 2409, please. It is
 22 the PowerPoint you have been looking at with Mr Beer,
 23 albeit that he has been looking -- in fact this is the
 24 same version that you were looking at with him just now
 25 that had some manuscript notes from yourself on it.

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1 We are looking at page 2409 and I believe this
2 document sets out the deployment plan for 26 January.
3 **A. It does. Yes, this outlines which AFO is in which**
4 **vehicle.**
5 Q. Were you involved in the development of that plan?
6 **A. No.**
7 Q. Did you have oversight of it?
8 **A. No, this is the responsibility of the operational**
9 **firearms commander.**
10 Q. But you were certainly present when it was delivered to
11 the firearms officers?
12 **A. Yes.**
13 Q. I wonder if you can help us with regard to what we can
14 learn from it document. I see with regard to the alpha
15 vehicle that the person, who in this instance was Q9, in
16 the alpha vehicle, in the first line, is indicated as
17 being -- against his name the words we have "shield" and
18 "entry" can you assist us as to what those words mean?
19 **A. Those are roles in the event of a deployment that they**
20 **would have access to a ballistic shield and a form of**
21 **method of entry, it would mean.**
22 Q. We are talking here about potentially intercepting
23 subjects as they are about to potential -- as they are
24 following a CVIT van, I think the plan, the preference,
25 was before they actually --

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1 **A. No, that perhaps oversimplifies the MASTS tactic**
2 **a little. A MASTS tactic covers a variety of tactics**
3 **within it if you like. People do tend to think it is**
4 **a vehicle based tactic but MASTS does give you the**
5 **ability to go on foot or indeed to slow things right**
6 **down with a building containment and a building entry if**
7 **appropriate and all of those are contained within the**
8 **MASTS, it is not just about a vehicle stop.**
9 Q. The role that has been given to each of those officers
10 in the alpha vehicle is not only specific to an entry on
11 to premises; is it that correct?
12 We are not looking solely at entry on to premises
13 and the deployments they were given that day.
14 **A. No, it is who is in which vehicle, what weapons they are**
15 **carrying and what other equipment they are responsible**
16 **for, should the tactics take them that way.**
17 Q. As far as bravo vehicle and charlie vehicle are
18 concerned, we see that two officers there have been
19 allocated the role of cover. Do you see that?
20 **A. I do see that, yes.**
21 Q. Does common sense assist us as to what that tells us
22 about their deployment?
23 **A. Common sense might, but I have to say the most**
24 **appropriate person to ask specifically what that means**
25 **is the OFC.**

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1 MS MURPHY: I will do that in due course. Thank you very
2 much, Mr Ellison.
3 **A. Thank you.**
4 THE CHAIRMAN: Mr Davies?
5 MR DAVIES: No thank you, sir.
6 THE CHAIRMAN: Ms Whyte?
7 Questions from MS WHYTE
8 MS WHYTE: As you know, Chief Superintendent, I ask
9 questions on behalf of Greater Manchester Police.
10 Can you recall whether DC Clark when briefing you in
11 the afternoon of 25 January referred to an investigation
12 from the mid 1990s called Operation Vulture 1995 to
13 1996, conspiracies to commit robbery.
14 **A. No, it is not something I can recall now, no.**
15 Q. Thank you.
16 Could I ask you, please, to go back to your log, so
17 it is tab 4 in your bundle, page 2323.
18 That is G1/2323 for others.
19 THE CHAIRMAN: Sorry, tab 4?
20 MS WHYTE: Tab 4, page 2323.
21 THE CHAIRMAN: 2323.
22 MS WHYTE: The second heading, "Capability", do you have
23 that?
24 **A. I do, yes.**
25 Q. Is this a fair summary, that your assessment of the

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1 capability of the subject, Mr Totton, was based in part
2 on information you had about previous use of weapons
3 during assaults?
4 **A. Yes.**
5 Q. But also because of the intelligence that you had
6 received which suggested that he associated with other
7 groups that are known to have used or discharged
8 firearms?
9 **A. Yes, that's correct.**
10 Q. It was not just about what you knew he had done or been
11 suspected of doing, it was about who he was suspected of
12 associating with and what their capability was?
13 **A. That is right. Just perhaps to add to that, sometimes**
14 **it is very difficult as a TFC establishing what is fact**
15 **and what is an assumption.**
16 Q. Yes.
17 **A. Sometimes you have to work on some reasonable working**
18 **assumptions as to what might happen in any deployment.**
19 **Sometimes the association map and the activity we have**
20 **seen with the surveillance for example could lead you to**
21 **make certain assumptions and it is bolting the fact and**
22 **the assumptions together which actually is the skill in**
23 **defining whether the criteria is met.**
24 Q. On this particular date your information about
25 associations informed your assessment of Mr Totton's

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1 capability?
 2 **A. Yes.**
 3 Q. That was relevant to whether or not firearms officers
 4 might be deployed and what the tactical options might
 5 be?
 6 **A. Yes, that's right.**
 7 Q. You have been asked about a reference on the briefing
 8 document, page 2403, I think, in the same tab, about
 9 Mr Grainger, Anthony Grainger, and the handwritten note
 10 that he was planning to commit offences with Mr Totton.
 11 Is it possible that that information came from the SIO,
 12 Robert Cousen, rather than DC Clark?
 13 **A. It is possible, but I don't recall Mr Grainger being**
 14 **mentioned before DC Clark was brought into the meeting.**
 15 Q. Did you continue to speak with the SIO after Mr Clark
 16 had finished his presentation; can you remember?
 17 **A. Yes. DI Cousen had left the room actually when DC Clark**
 18 **came in but he did return.**
 19 Q. Is it possible that you conversed with him after
 20 DC Clark had finished speaking?
 21 **A. That is possible, yes.**
 22 Q. Even though on 25 January you didn't know who was with
 23 Mr Totton, your assessment was that MASTS was the
 24 appropriate tactical option?
 25 **A. Yes.**

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1 Q. Are you able to assist us with the rationale on that
 2 particular occasion for the authorisation of the issue
 3 of specialist munitions?
 4 **A. Yes. In the event that the MASTS team may have to**
 5 **enforce a vehicle stop because of -- well, only on the**
 6 **authority of the TFC but had they had to move to**
 7 **a vehicle stop, it is a contingency plan to carry**
 8 **special munitions, it is not a matter of routine. But**
 9 **it enables them to stop a vehicle more quickly. The use**
 10 **of CS dispersal canister example is through a smashed**
 11 **window into the vehicle, it is not an explosive device**
 12 **it is aerosol based and it puts CS into the vehicle and**
 13 **helps the staff -- the officers to more safely detain**
 14 **those who are inside it if they are not complying.**
 15 **The round that was used is -- it can be used for**
 16 **blowing off hinges from a shotgun, it can be used for**
 17 **blowing out a tyre. So it is a way of making sure that**
 18 **that suspect vehicle remains static if the occupants are**
 19 **failing to comply.**
 20 Q. That was your rationale?
 21 **A. It was always a contingency on the basis that that**
 22 **vehicle fails to stop.**
 23 Q. Something to be used upon non-compliance or evidence of
 24 non-compliance, yes?
 25 **A. Yes.**

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1 Q. Two other brief issues, please.
 2 Did the TAC adviser disagree with you at all during
 3 your discussions with him about tactical options?
 4 **A. No, not that I recall at all.**
 5 Q. Thank you.
 6 Would you note any disagreement, should it arise?
 7 **A. Yes, that would be quite a significant point actually.**
 8 **Whilst the decision for the tactic sits with me as the**
 9 **TFC, to disregard the view of a specialist tactical**
 10 **firearms adviser would need carefully articulated**
 11 **rationale.**
 12 Q. Thank you.
 13 The last area I would like to ask you about is the
 14 contingency of disruption and particularly over the
 15 weekend, when the information that you had caused you to
 16 believe that there was a lower risk of a high value CVIT
 17 occurring. If I can put it that way --
 18 **A. Yes.**
 19 Q. -- and just explore that in a little more detail very
 20 briefly.
 21 The contingency that you suggested in your email,
 22 was a "van guard", wasn't it, it was a police presence
 23 following a cash in transit vehicle?
 24 **A. Yes.**
 25 Q. It was not police officers disrupting the suspects, such

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1 as they were, but simply to follow the vehicle. Is that
 2 right?
 3 **A. It was a uniformed presence as a deterrent to any would**
 4 **be offenders, yes.**
 5 Q. Would part of the reason for that be, on the particular
 6 facts of that deployment, because the suspects had,
 7 according to surveillance anyway, only expressed
 8 reconnaissance interest in the depot and the vehicles
 9 going in and out of the depot, as far as cash delivery
 10 was concerned?
 11 **A. And specifically early morning on weekdays, yes.**
 12 Q. Yes, so the information available to you when you
 13 decided upon that weekend reduction and type of
 14 potential disruption tactic was because you had
 15 information that was very specific to one premises and
 16 vehicles at a particular time of day going in and out of
 17 the premises?
 18 **A. Yes.**
 19 Q. Is it also fair to say that to place a marked vehicle by
 20 a cash in transit van would not necessarily alert your
 21 suspects to the fact that you had been surveilling them?
 22 **A. No, absolutely. The number of deliveries that day was**
 23 **so small that the presence of a marked car in a town**
 24 **centre shouldn't have been there as an alert but was**
 25 **just sufficient to be a deterrent.**

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<p>1 MS WHYTE: Thank you very much. 2 Thank you, sir. 3 Further questions from MR BEER 4 MR BEER: Just three topics lastly from me, officer. 5 You mentioned that the specialist munitions were 6 there as a contingency, not as a weapon of first resort. 7 Is that right? 8 A. Absolutely right, yes. 9 Q. The contingency would be if the vehicle failed to stop; 10 is that right? 11 A. Well, the occupants, significantly that the occupants 12 were failing to comply. 13 Q. What is the distinction between those? 14 A. The MASTS tactic in terms of an enforced vehicle stop is 15 quite dynamic, in terms of in this instance because we 16 had two subject vehicles, two of the MASTS vehicles 17 would have been deployed per vehicle. To stop a vehicle 18 under a MASTS you can use anything between two and four 19 vehicles, but given the logistics of two subject 20 vehicles it would have been two to stop the one. 21 They would move -- once the TFC gives the 22 instruction to go to State Amber, that puts control of 23 the vehicle stop in the hands of the OFC and it's then 24 for the OFC to do it at the most appropriate and safest 25 time with due care to what might be going on around in</p> <p style="text-align: center;">Page 185</p>	<p>1 A. I am, thank you, yes. 2 Q. 2728. 3 A. 2728, yes. 4 Q. That should be a report from somebody called J3, dated 5 24 July 2012, do you have that? 6 A. I have, yes. 7 Q. J3, I know, I think is an inspector in the Tactical 8 Firearms Unit and he says in the first paragraph: 9 "I am the officer in charge of the operations team 10 within the Tactical Firearms Unit." 11 This is a typed up version of a report submitted in 12 response to a request from the IPCC. 13 A. Right. 14 Q. He says: 15 "In relation to requests for information regarding 16 Op Shire deployments which have been requested via 17 emails from ... to Iain Foulkes, I report as follows 18 ..." 19 If you go over to 2730: 20 "I submitted a previous report dated 18 July, having 21 liaised with somebody else. I now submit this report 22 which override my previous report and has more relevant 23 information concerning the Op Shire briefings and 24 deployments. I have created a table with all the 25 required information, which is attached to this report."</p> <p style="text-align: center;">Page 187</p>
<p>1 terms of where they tried to stop it, but the stop was 2 very dynamic. At the earliest opportunity they will 3 move front and rear on the vehicle and literally come to 4 a stop in a very dynamic fashion very close to the 5 subject vehicle so it cannot move. 6 As the AFOS alight, if the occupants of the subject 7 vehicle are failing to comply or failing to respond to 8 any verbal instructions, then the contingency plan can 9 be used to make absolutely sure they can control the 10 subjects in a safe, non-lethal way, which is the CS 11 dispersal canister, and actually to use the rounds to 12 take out the tyres of the vehicle and make sure it 13 cannot attempt to move or ram the police vehicles. It 14 is a contingency. 15 Q. I understand, thank you. 16 The second issue, have you ever sought a firearms 17 authority and sought approval from an ACC for your 18 tactics without having input from a TA, from a tactical 19 adviser? 20 A. Personally, no. 21 Q. The last thing is, can we take out file G2 at page 2728. 22 MR THOMAS: Could you repeat that, please? 23 MR BEER: G2/2728. 24 MR THOMAS: Thank you. 25 MR BEER: Are you there?</p> <p style="text-align: center;">Page 186</p>	<p>1 Can you see that there is a table that stretches 2 over two pages that sets out the date of a deployment -- 3 sorry, the date of a briefing, whether a briefing was 4 conducted, whether it was recorded, the name or number 5 of the firearms authority, whether there was 6 a deployment and then some notes. 7 Can you see, second from the bottom, for 8 26 January 2012, which is your one, or one of your 9 two -- 10 A. Yes. 11 Q. -- there was a briefing pack, a briefing was delivered, 12 was the briefing recorded? No. But then if you look in 13 the right-hand column it says: 14 "Briefing not recorded, operator error by OFC, the 15 operational firearms commander." 16 Can you see that? 17 A. Yes. 18 Q. Then similarly for the next day, exactly the same set of 19 facts: 20 "Briefing not recorded, operator error by OFC." 21 Then at the top of page 2732, for 30 January, this 22 was not one of yours I think, I think you had handed 23 over to Mr Hankinson by then? 24 A. That's right, yes. 25 Q. "Briefing not recorded, operator error by operational</p> <p style="text-align: center;">Page 188</p>

<p>1 firearms commander." 2 So out of all of the briefings, we have got three 3 that don't appear to have been recorded, 26, 27 and 4 30 January 2012 on the information provided by GMP. 5 Then if we can go back, please, to page 2658, which 6 is helpfully between two blank pages and upside down. 7 A. Yes. 8 Q. This is an internal report by the IPCC. He says on 9 12 June: 10 "I listened to briefing discs, X173, X174 and X176." 11 Just to help you, they are three disks for 26, 27 12 and 30 January respectively, the three ones. 13 A. Yes. 14 Q. He says: 15 "It is my understanding that these disks are the 16 originals. They were all found to be blank. I spoke to 17 [somebody else] who is responsible for the briefing room 18 recording equipment. He stated that the officer giving 19 each briefing is responsible for operating the equipment 20 and pressing the record button." 21 Does that accord with your understanding? 22 A. It does, yes. 23 Q. "... after the briefing is over the officer responsible 24 should press the fix it button which then prevents the 25 disk being recorded over."</p> <p style="text-align: center;">Page 189</p>	<p>1 Thank you. 2 (4.40 pm) 3 (the Inquiry adjourned until 10.30 am the following day) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 191</p>
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<p>1 Does that accord with your understanding? 2 A. That is not knowledge I've got I am afraid. As far as 3 I was aware each of those two briefings had been 4 properly recorded. 5 Q. "After that the disk is sealed and placed on an in tray 6 in the general office for storage and is logged on 7 a spreadsheet by [somebody else]. [Somebody else] 8 stated that the recording equipment was working fine and 9 successfully recording briefings immediately preceding 10 and after X173 and 176." 11 I am just using you to put some evidence before the 12 chairman, to make good the point I mentioned earlier 13 that the information we have from GMP is that this 14 briefing, the 26 January briefing, is not recorded. 15 If it helps as well, sir, Ms Cartwright has listened 16 to those three disks with the X numbers and they are 17 blank. 18 THE CHAIRMAN: Yes. Thank you. 19 MR BEER: Sir, they are the only supplemental questions 20 I have. 21 THE CHAIRMAN: Thank you very much, Mr Beer. 22 Thank you, Mr Ellison, for helping the Inquiry. 23 That is the end of your evidence. You are free to go. 24 MR BEER: Sir, can we say 10.30 tomorrow. 25 THE CHAIRMAN: 10.30 tomorrow morning. Thank you very much.</p> <p style="text-align: center;">Page 190</p>	<p>1 2 3 I N D E X 4 5 MS NICOLA MOORE (sworn)1 6 Questions from MR BEER1 7 Questions from MS WHYTE42 8 Questions from THE CHAIRMAN50 9 Further questions from MR BEER51 10 MR MARK CALLAGHAN (sworn)54 11 Questions from MR BEER54 12 MR STUART ELLISON (sworn)77 13 Questions from MR BEER77 14 Questions from MR THOMAS169 15 Questions from MS MURPHY171 16 Questions from MS WHYTE179 17 Further questions from MR BEER185 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 192</p>
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